

# **OLD POST OFFICE BUILDING REDEVELOPMENT**

## **FINAL ENVIRONMENTAL ASSESSMENT**



**WASHINGTON, DC**

**U.S. GENERAL SERVICES ADMINISTRATION**  
**IN COOPERATION WITH THE NATIONAL CAPITAL PLANNING COMMISSION**  
May 2013

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# OLD POST OFFICE BUILDING REDEVELOPMENT

## FINAL ENVIRONMENTAL ASSESSMENT

Responsible Agency:

**U.S. General Services Administration**

Cooperating Agency:

**National Capital Planning** Commission

### **Abstract:**

The U.S. General Services Administration (GSA), in cooperation with the National Capital Planning Commission and the National Park Service, has prepared this Environmental Assessment (EA) for the redevelopment of the Old Post Office (OPO) in Washington, DC. The redevelopment of the site would include a hotel, restaurants with outdoor seating, a spa, and other amenities. The bell tower would remain open to visitors. A driveway along Pennsylvania Avenue at 11<sup>th</sup> Street, NW would be installed. This EA considers the environmental effects of implementing the No Action (No Build) Alternative and an Action Alternative.

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## **1.0 PURPOSE AND NEED**

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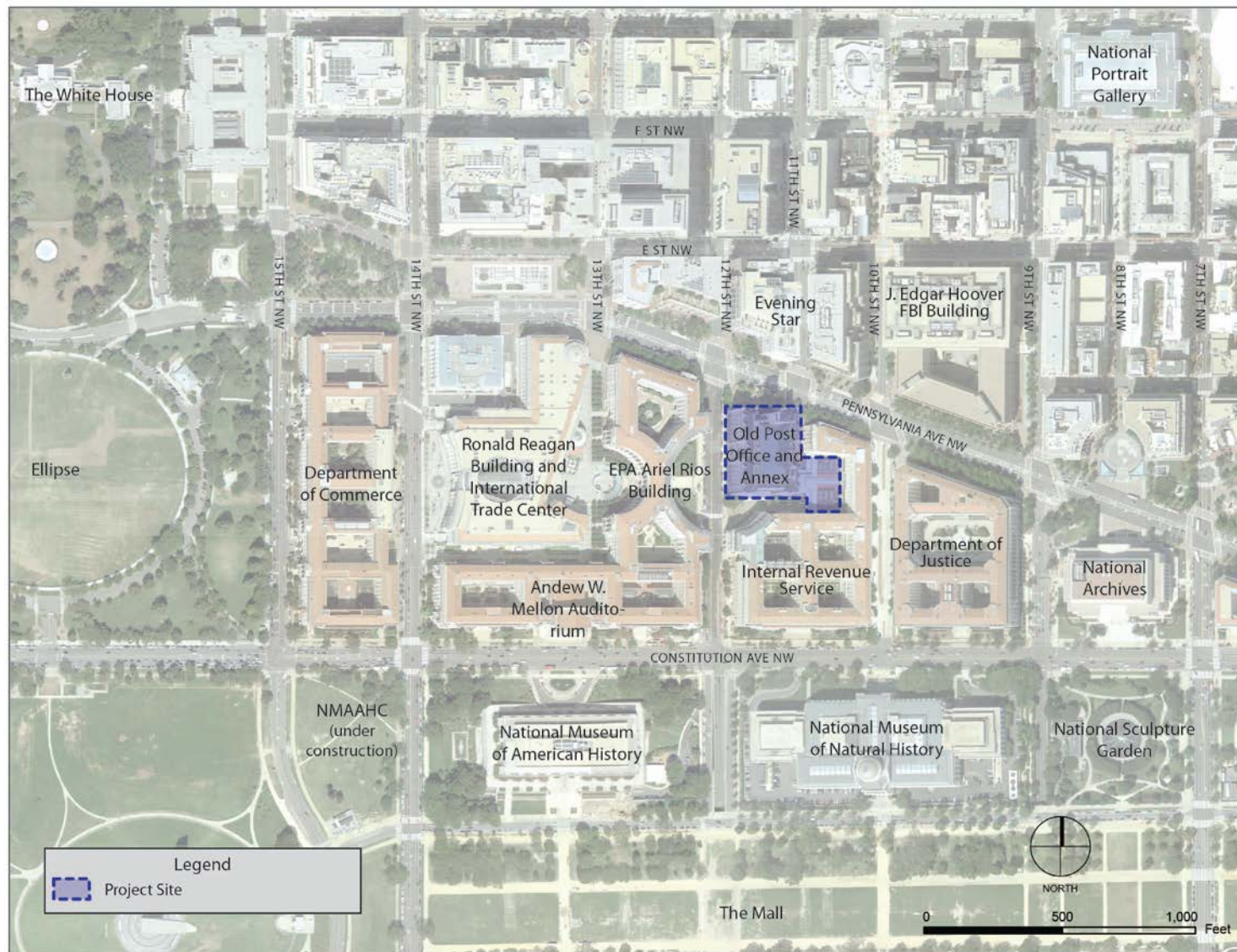
## **1.1 WHAT IS GSA PROPOSING AND HOW IS THIS ENVIRONMENTAL ASSESSMENT BEING PREPARED?**

The U.S. General Services Administration (GSA) proposes to redevelop the Old Post Office Building (OPO) located at 1100 Pennsylvania Avenue, NW in Washington, DC (Figure 1-1). The Old Post Office Building, which consists of approximately 465,000 square feet, is listed in the National Register of Historic Places and is also a contributing element to the Pennsylvania Avenue National Historic Site. Following an open competition, GSA made the announcement of the preferred selected developer for the redevelopment of the Old Post Office Building. As proposed, the project would convert the historic building and adjacent Annex from a combination of office and retail uses to a luxury hotel and conference facility. In addition to guest rooms and suites, the complex would include two or three restaurants, a spa, meeting and ballroom banquet facilities, a gift shop, and a newly dedicated Congress Bells Museum. The existing Clock Tower would continue to be open to the public. By Public Law (PL) 98-1, the National Park Service (NPS) provides tours and interpretation for the public through an agreement with GSA.

GSA is preparing this Environmental Assessment (EA) to determine the potential impacts that the redevelopment of the OPO may have on the natural and man-made

environment. This EA is being prepared in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508 (1986)], the National Historic Preservation Act (NHPA) of 1966, as amended, and GSA's PBS *NEPA Desk Guide*. The National Capital Planning Commission (NCPC) and NPS are cooperating agencies in this effort. A cooperating agency is defined by CEQ as an agency that has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) (CEQ 2007). In making their decision to transfer jurisdiction of a portion of property to GSA to allow proposed action to move forward, the NPS, in accordance with 43 CFR 46.320, is adopting GSA's 2013 Final EA and will issue its own decision document based on findings of this EA and any public input received.

This EA identifies an Action Alternative and a No Action Alternative. Potential environmental impacts are described for each of the alternatives, including short-term construction-related impacts, long-term operational impacts, and cumulative impacts resulting from the implementation of the proposed action together with other current or planned projects. In addition, mitigation measures are suggested to address identified impacts. The study area for the assessment of impacts is generally within a two-block radius of the site; however, this area may expand or contract based on the resource discipline.



**Figure 1-1 Project Site and the Surrounding Area**

*Source: AECOM 2012*

## **1.2 WHAT IS THE HISTORY OF THE BUILDING AND THE PROJECT?**

The OPO was constructed in the last decade of the 19<sup>th</sup> century to function as the headquarters of the United States Postmaster General, the Post Office Department, and as the City Post Office. The building was originally designed by Willoughby J. Edbrooke, Supervising Architect of the Treasury between 1891 and 1893, but was subsequently managed by four additional Supervising Architects before its completion in 1899. Nine stories high, the Romanesque Revival Style Building was the first public building erected in the area that is now known as the Federal Triangle.

In 1914, the City Post Office moved to a new location west of Union Station. The Post Office Department remained in the OPO until 1934, when they moved to a new location across 12<sup>th</sup> Street, NW. Since the departure of the Post Office Department nearly 80 years ago, the OPO has provided office space for a range of federal agencies.

In 1976, GSA used the Cooperative Use Act to redevelop the two lower floors of the building. In 1982 GSA entered into a 55-year lease to develop retail shops, food vendor courts, and restaurants in 109,000 square feet (sf) of space that currently operates in the ground floor and mezzanine levels of the OPO. This lease was eventually bought out. Pursuant to the enactment of PL98-1 in 1983 that designated the Nancy Hanks Center and Old Post Office Building, GSA and

NPS have entered a series of agreements for the NPS to provide tours and interpretation of the Clock Tower for the public that continues to the present. The Annex was constructed in 1992.

On October 8, 2008, Congress passed the Old Post Office Redevelopment Act of 2008 (PL 110-359), which directs GSA to proceed with the redevelopment of the Old Post Office.

On March 24, 2011, GSA released a Request for Proposals (RFP) for the Redevelopment of the OPO. After reviewing the ten proposals received, GSA selected a preferred developer, Trump Old Post Office, LLC ("Trump"), on February 7, 2012. Trump and GSA are currently negotiating a contract for the lease. The NEPA and Section 106 processes must be completed prior to GSA and the preferred selected developer entering into agreement. Once contract negotiations are complete and all relevant permits, transfers of jurisdiction, and approvals are obtained, including but not limited to NCPC and the U.S. Commission of Fine Arts (CFA) approvals, construction on the rehabilitation of the Old Post Office may begin.

In accordance with Public Law (PL) 110-359, GSA is authorized "to provide replacement space for Federal agency tenants housed in the Old Post Office Building whose relocation is necessary for the redevelopment of the Building."

### **1.3 WHAT IS THE PURPOSE AND NEED OF THE OLD POST OFFICE REDEVELOPMENT?**

The purpose and need for the proposed action is to comply with the OPO Redevelopment Act of 2008 (Public Law [PL] 110-359, 122 Stat. 4005, Oct. 8, 2008)), which directs the GSA Administrator to proceed with the redevelopment of the OPO. As stated in PL 110-359, redevelopment of OPO would preserve the building's historic integrity and provide a lucrative financial return to the Government.

In order to meet the directive in PL 110-359, GSA has solicited proposals from the private sector for the redevelopment of the OPO. In addition to those identified in the legislation, GSA in the RFP identified the following goals for the redevelopment of the OPO:

- Leverage the expertise of the real estate industry to reposition the OPO as a viable asset;
- Provide for public access; and
- Contribute to the vitality of Pennsylvania Avenue, the Federal Triangle, and the District of Columbia.

### **1.4 HOW WERE AGENCIES AND THE PUBLIC INVOLVED IN THE DEVELOPMENT OF THIS EA?**

GSA initiated the NEPA public scoping process on January 3, 2011 through the distribution of letters to regulatory and review agencies requesting comment on the scope of the EA and the draft goals to be outlined in the RFP for the redevelopment of the Old Post Office. In addition, a notice was posted on the GSA website announcing the agency's intention to prepare an EA and to solicit public comment during the scoping period. The public comment period was open through January 19, 2011. Comments received during this period were taken into consideration in the development of this EA.

Agency consultation meetings have taken place through the coordinated Section 106 and NEPA processes. The first coordination meeting occurred on December 9, 2010 and included representatives from the District of Columbia State Historic Preservation Office (SHPO), the National Capital Planning Commission (NCPC), the U.S. Commission of Fine Arts (CFA), NPS, the Internal Revenue Service (IRS) and GSA. The focus of the meeting was to introduce the project and initiate the Section 106 and NEPA processes, as well as to answer questions. Since then, GSA has met with the Advisory Council on Historic Preservation (ACHP) (March 13, 2012), CFA and NCPC (March 4 and October 10, 2012), NPS (March 15, June 19, and September 17, 2012), and the IRS (June 12, 2012). In addition, GSA coordinated

with the District of Columbia Department of Transportation (DDOT) District, including meetings on March 15 and June 7, 2012 to address transportation issues.

GSA held an initial Section 106 consulting parties meeting on May 22, 2012. The purpose of the meeting was to introduce the project to the consulting parties. Individuals in attendance included representatives from SHPO, NCPC, CFA, NPS, ACHP, IRS, DDOT, the District of Columbia Office of Planning (DCOP), the National Trust for Historic Preservation, the District of Columbia Preservation League, the Committee of 100, and neighboring property owners. A site visit to the OPO was held on June 26, 2012, and follow-up consulting parties meetings took place on July 25, 2012, September 19, 2012, and November 27, 2012.

Starting with the coordination meeting held on December 9, 2010 and continuing throughout the project planning, GSA has engaged with NPS. In November 2012, GSA began outreach with the NPS regarding a potential transfer of jurisdiction from NPS to GSA for the area along Pennsylvania Avenue in front of the Old Post Office to facilitate development and operation.

#### NEPA Documentation

The Draft EA was released for public comment on December 10, 2012. The organizations, agencies, and individuals identified in the notification list in Section 4.3 of the Appendix were notified by mail or email of the

availability of the Draft EA and provided with a digital copy. Further, copies of the Draft EA were available for review at the Martin Luther King, Jr. Memorial Library, 901 G Street, NW, Washington, DC. During the public comment period, eleven comment letters were received from agencies, organizations, and individuals. The comment letters and responses to substantive comments are provided in Section 4.7 of the Appendix.

Based on the analysis provided within the EA, GSA has concluded that the proposed redevelopment of the OPO is not a major federal action significantly affecting the quality of the human environment. Therefore, GSA has determined that a Finding of No Significant Impact (FONSI) is appropriate for the redevelopment of the OPO.

The FONSI and the Final EA were released to the public on May 21, 2013. The organizations, agencies, and individuals listed in the notification list in the Appendix were provided with an electronic copy of the Final EA and FONSI. The FONSI will become final 30 days after publication of its Notice of Availability, provided that no information leading to a contrary finding comes to light during the 30-day review period.

Comments on the Final EA and FONSI must be submitted to GSA during the 30-day public comment period. These comments will be circulated to both NCPC and NPS to consider in their decision making processes. The review period for the Final EA and FONSI concludes on June 21,

2013 and written comments must be postmarked by this date. Comments should be mailed or emailed to:

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### **1.5 WHAT RESOURCE ISSUES ARE CONSIDERED IN THIS DOCUMENT?**

This EA has been prepared to evaluate the potential impacts that the site improvements would have on a range of natural and man-made resources. These include:

- land use
- planning policies
- public space
- archaeological resources
- historic resources
- visual resources
- socioeconomics
- vegetation
- stormwater management
- floodplains
- air quality
- vehicular circulation
- parking
- public transportation
- pedestrian circulation
- utilities
- energy use and sustainability

## 1.6 WHAT RESOURCE ISSUES HAVE BEEN ELIMINATED FROM DETAILED ANALYSIS?

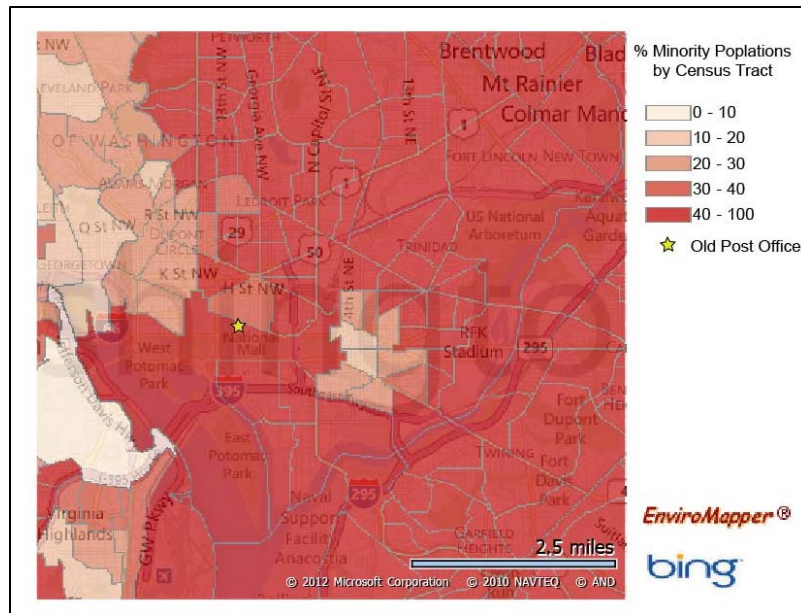
Several issues were initially considered for evaluation in this EA, but were eliminated from detailed study because impacts would be negligible in intensity or not applicable to the project, as the resource does not exist within the study area. These issues, and the rationale for their elimination, are as follows:

*Community Facilities:* The proposed action would not increase or decrease the population of the area, or change the current residents' access to community facilities. Thus, there would be no impacts on this resource area.

*Climate Change:* The scope and nature of the redevelopment activities at the OPO would not greatly increase energy usage or vehicular emissions and are therefore not anticipated to substantively impact climate change or greenhouse gas emissions. In addition, the redevelopment would include sustainable construction and building operations practices. Thus, this resource area was dismissed from detailed analysis.

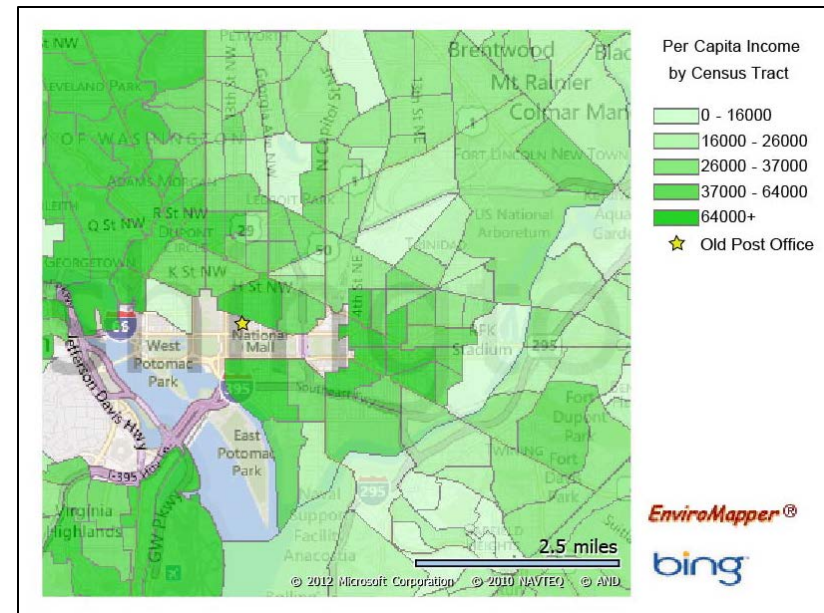
*Demographics and Environmental Justice:* Executive Order 12898 requires each federal agency to consider achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. The proposed action would not release contaminants in excess of Federal or District of Columbia regulatory standards. Thus, there would be no demonstrably high and adverse human health or environmental effects, which can be attributed to this proposed action. The project site is located in an area with no resident population, but there are five census tracts within a half-mile of the project site that include resident populations. The census tracts closest to the project site have a minority population similar to the District of Columbia as a whole and per capita incomes that range from ten percent below to over 100 percent above the District of Columbia average. Therefore, independent of the analysis concerning exposure to contaminants and the presence of environmentally compliant programs, the impacts from the proposed action would not result in disproportionately high and adverse human health or environmental effects on low-income or minority populations. Thus, there would be no impacts on demographics or environmental justice.





**Figure 1-2 Percentage of Minority Populations**

Source: US EPA EJ View, 2012



**Figure 1-3 Per Capita Income**

Source: US EPA EJ View, 2012



*Hazardous Materials:* The redevelopment of the Old Post Office would not introduce new hazardous materials to the project site and surrounding area. GSA commissioned a Pre-Alteration of Hazardous Material Survey of the Old Post Office Building in 2002. The results indicated the presence of lead paint, asbestos, and fluorescent light fixtures with PCB containing light ballasts, and the air handler unit controls may contain mercury. If such materials are present and must be removed or disturbed, licensed contractors will handle and/or remove the materials in accordance with applicable regulations.

*Geology, Topography, and Soils:* The existing site is fully developed, including the existing Old Post Office Building and the adjacent hardscape. Beyond the replacement of sidewalks and driveways, the proposed action would require limited excavation or disturbance of soils to provide access to the parking area located in the Annex basement. Thus, there would be negligible impacts on this resource area.

*Noise:* Construction under the proposed action would generate noise under 80 dBA, or A-weighted decibels, between the hours of 7:00 a.m. and 7:00 p.m. in accordance with DC noise regulations. The majority of the redevelopment activity would be interior, rather than exterior, further limiting noise impact. In addition, construction noise would be temporary. Thus, there would be negligible impact on this resource area.

*Water Resources:* Due to the absence of surface water at the Old Post Office site, impacts on water resources are anticipated to be negligible. Floodplains and flooding are analyzed in detail in this EA.

*Wildlife:* Wildlife on the Old Post Office site is limited to urban species, including grey squirrels, house sparrows, rodents, and pigeons. These species could be temporarily dispersed during construction. However, urban wildlife would be expected to return to the site once construction is completed.

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## **2.0 ALTERNATIVES**

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## **2.1 WHAT ALTERNATIVES ARE BEING CONSIDERED IN THIS ENVIRONMENTAL ASSESSMENT?**

This EA evaluates an Action Alternative, the redevelopment of the Old Post Office and Annex, and a No Action Alternative. The Action Alternative represents the concept selected by GSA in the spring of 2012 for the redevelopment of the Old Post Office and Annex, as refined during the ongoing Section 106 consultation process. The evaluation of the No Action Alternative is required by CEQ regulations and is intended to serve as a baseline for the assessment of impacts.

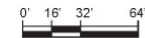
## **2.2 WHAT IS THE ACTION ALTERNATIVE?**

The Action Alternative is the redevelopment of the OPO in accordance with PL 110-359, the Old Post Office Building Redevelopment Act of 2008. Under the Action Alternative, GSA would sign a lease agreement with a private-sector developer for the redevelopment. This section describes in detail the proposed redevelopment program of the preferred selected developer and the actions that would occur to accomplish the redevelopment.

### **2.2.1 Redevelopment Summary**

Under the Action Alternative, the OPO would be redeveloped as a mixed-use luxury hotel and conference facility. The facility would provide a total of 502,000 gross square feet, with approximately 267 hotel rooms and suites and approximately 63,300 sf of museum space, restaurants, retail spaces, a bar/lounge, an exhibition gallery, a library/seating area, a spa and health club, a gift shop, a ballroom, and conference space (Figure 2-1). Approximate square footages for each of the primary uses are provided in Table 2-1.

Public landscaped gathering spaces would be provided on the north and south sides of the building. To facilitate this redevelopment, a transfer of jurisdiction from NPS to GSA of certain exterior paved areas (portions of the plaza and sidewalks) along Pennsylvania Avenue is



*Source: Beyer Blinder Belle*

Space	Building/Floor	Square footage*
Plaza Cafe	OPO/Ground Floor	2,100 sf
Congress Bells Museum	OPO/Ground Floor	1,100 sf
OPO Museum	OPO/Ground Floor	3,300 sf
Retail	OPO/Ground & First Floor	8,900 sf
Library	OPO/First Floor	2,900 sf
Gift Shop	OPO/First Floor	1,700 sf
Bar	OPO/First Floor	1,700 sf
Pennsylvania Avenue Restaurants	OPO/First and Second Floors	16,600 sf
Spa/Health Club	Ground Floor	4,400 sf
Ballroom	Annex/First Floor	13,600 sf
Conference Rooms	Annex/Second Floor & OPO Ground Floor	7,000 sf
Hotels Rooms and Suites	OPO/First Floor through Ninth Floors	267 Rooms
<i>OPO Gross Square Feet</i>	<i>OPO Building</i>	<i>415,000 gross sf</i>
<i>Annex Gross Square Feet</i>	<i>Annex</i>	<i>87,000 gross sf</i>
<i>Total Gross Square Feet</i>	<i>OPO and Annex</i>	<i>502,000 gross sf</i>

**Table 2-1: Approximate Square Footage of Primary Spaces within the OPO Building and Annex**

Source: WDG

*\* Note that square footages may change as the Section 106 process progresses and concepts and programming are further refined.*

contemplated; such a transfer would precede redevelopment. The rehabilitation and redevelopment of the OPO is projected to be completed by December 2015, with the hotel opening by early 2016. In order to maintain the historic integrity of the OPO, alterations would be accomplished in accordance with the Secretary of the Interior's Standards for Historic Properties. In addition, the redevelopment would use sustainable design principles established in the Leadership in Energy and Environmental Design for New Construction and Major Renovation Projects (LEED-NC) standard.

### **2.2.2 Interior Renovation**

The redevelopment of the OPO would transform the interior of the Old Post Office Building from a combination of retail and office space to a mixed-use luxury hotel. The interior improvements would conform to the Secretary of Interior's Standards for Historic Preservation.

#### Ground Floor

The ground floor would be accessed through doors on the south side of the building. The ground floor would provide access to the building's Clock Tower. The existing retail space within the ground floor of the Cortile -- as the central atrium of the building has historically been called -- would be replaced to allow for the conversion of the ground floor to hold the Old Post Office and Congress Bells Museums,

new retail tenant spaces, spa and fitness space, meeting rooms and back of the house space (Figure 2-2).

#### First Floor

The first floor of the OPO Building would be organized around the central open space of the Cortile; uses on this floor would include the hotel's front desk, concierge, retail space(s), a bar/lounge, a library/seating area, restaurants or retail on the northeast and northwest corners of the building as well as a restaurant in the Cortile space, and a limited number of hotel guest rooms (Figure 2-3).

#### Mezzanine

The mezzanine, one level above, would include additional space for first-floor restaurants or retail and additional hotel rooms (Figure 2-4).

#### Upper Floors

The balance of the hotel rooms and suites would be located on floors two through nine. The majority of the rooms would be located to the outside of the hallway circulating around the Cortile. Some of the new rooms would be larger suites.

#### Cortile

The hanging sculpture by Robert Irwin, 48 Shadow Planes, would be removed from the Cortile temporarily for conservation, but would be returned to its original location.



The Cortile's multi-story open space, characterized by the original metal trusses, would be maintained.

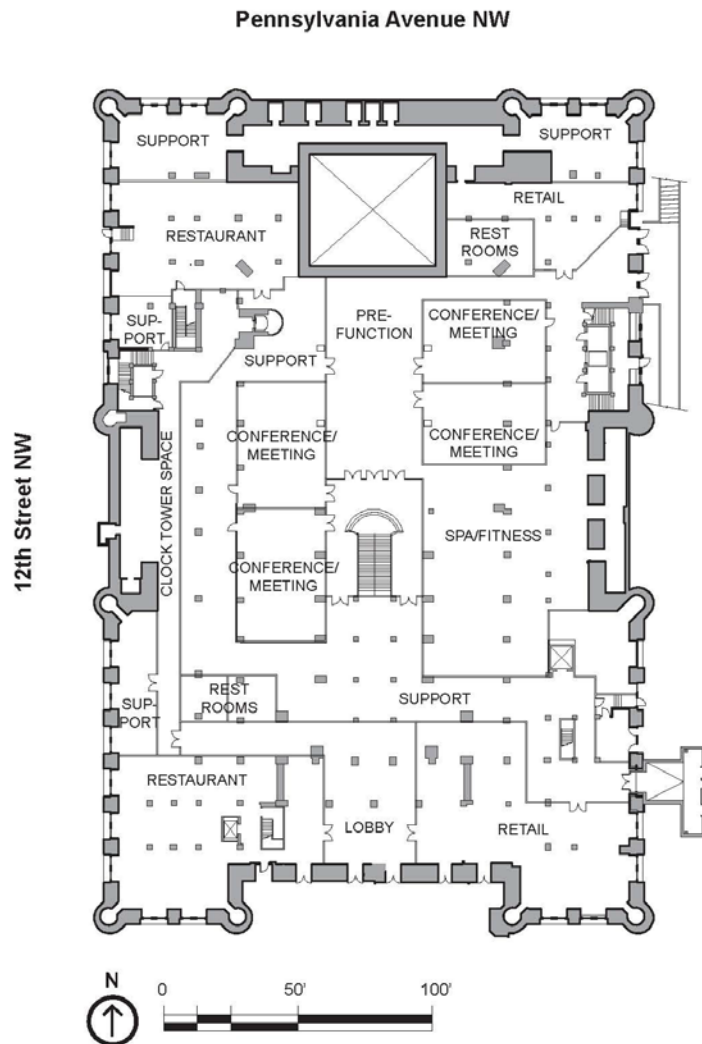
#### Clock Tower Space

The Clock Tower would remain open to the public with tours and interpretation for the public provided by the NPS through an agreement with GSA pursuant to P. 98-1, 97 Stat. 3, at 4, Section 4 (Feb. 15, 1983). Clock Tower public and support space would undergo a renovation, including refreshing of interior finishes (e.g. new paint and carpet). Space for queuing would be provided on the ground floor within the space labeled as Clock Tower Space and restrooms would also be conveniently located for Clock Tower visitors (see Figure 2-2). All improvements to the Clock Tower would be coordinated with NPS.

#### Annex

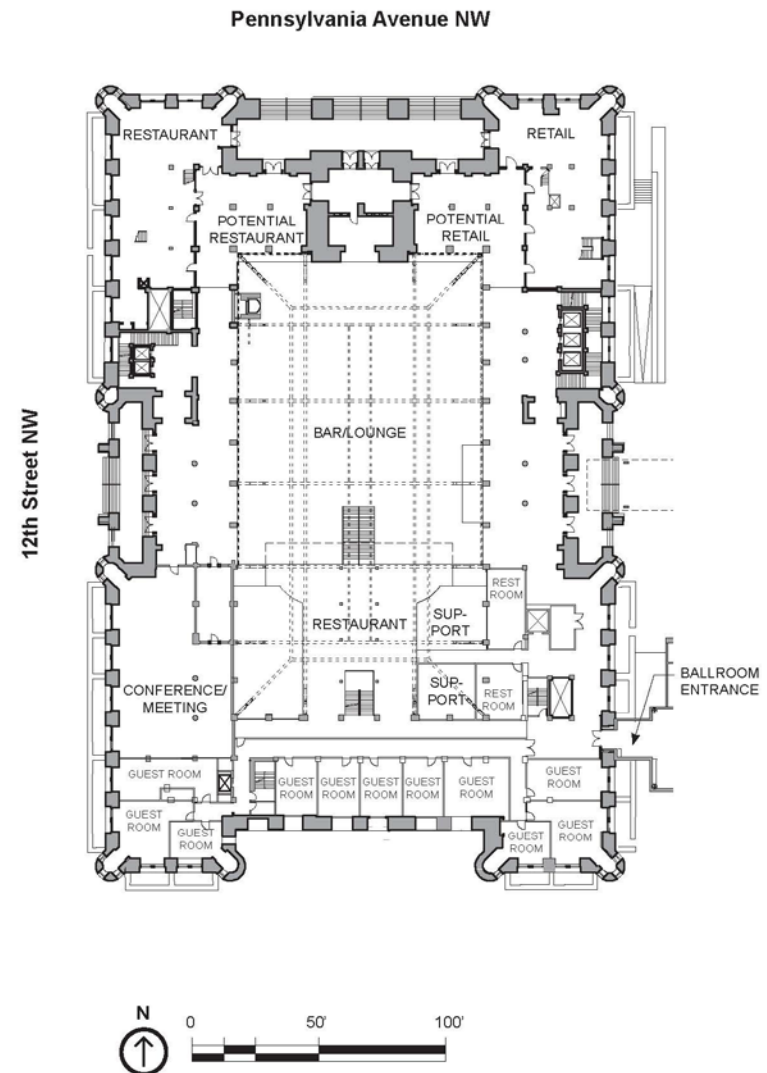
The Annex, which is currently vacant, would be maintained and renovated for use as a ballroom and conference facility, with parking and mechanical systems (Figures 2-5 and 2-6). The annex would have a total of 86,900 gross sf, with approximately 34,400 gross square feet in the basement, 31,600 gross sf in the ground floor, and 21,000 gross sf in the upper floor. The existing connection to the Old Post Office Building would remain in place and would be renovated to serve as both a service and guest connection between the buildings.

The basement of the Annex would be converted to a parking garage with up to 150 valet parking spaces and would be accessed from the east side of the circular drop-off on 11<sup>th</sup> Street. In addition to parking, the Annex basement would house new high-efficiency mechanical systems that would replace the existing building systems connected to the IRS facility. Measures to limit water infiltration into the OPO and the mechanical room would be installed. These systems may include high-efficiency boilers, new chillers and mechanical systems, and a Building Management System.



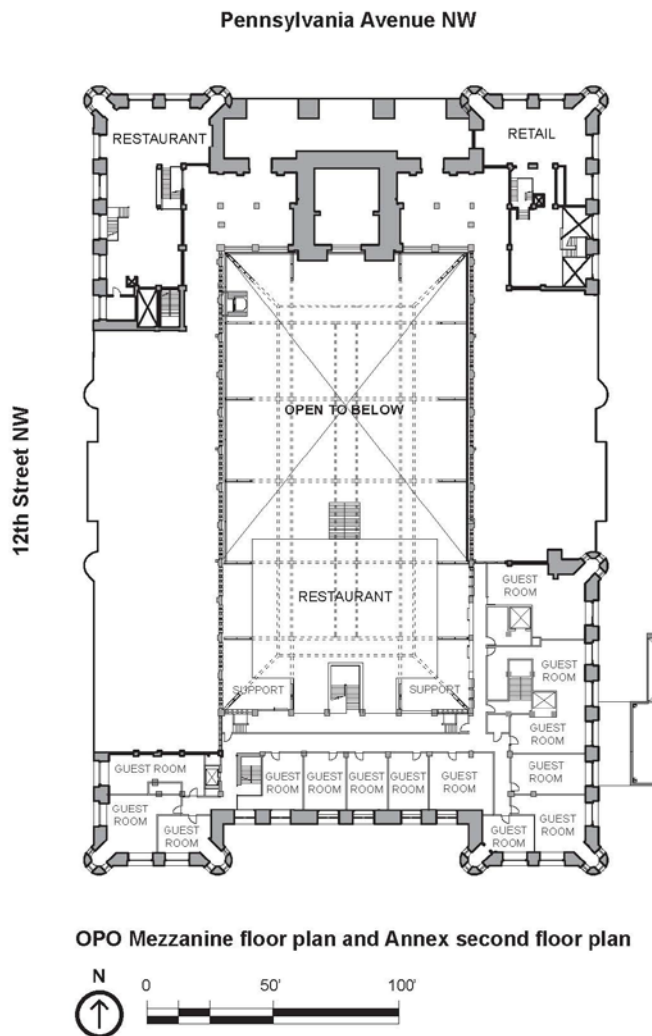
**Figure 2-2: Proposed Ground Floor Plan of OPO Building**

*Source: Beyer Blinder Belle*



**Figure 2-3: Proposed First Floor Plan of OPO Building**

*Source: Beyer Blinder Belle*



**Figure 2-4: Proposed Mezzanine Plan of OPO Building**

Source: Beyer Blinder Belle

### 2.2.3 Building Exterior

The historic exterior of the Old Post Office Building would be rehabilitated, in accordance with Secretary of Interior Standards. The original exterior windows' sashes, frames, and hardware would be repaired and repainted and the glass panes would be reglazed. The interior storm windows, installed during the last rehabilitation of the building, would be replaced with more energy-efficient interior storm windows. In addition, new windows would be installed in the roof on the central and southern portion of the 11<sup>th</sup> Street side of the building and on the C Street side. The glass in the Cortile skylight, which dates to the 1980s, would be replaced with new glass. The existing exterior doors which are not historic may be replaced with new doors.

Canopies at the entrances at 11<sup>th</sup> Street and Annex are proposed to shield the doorways, design and materials of the canopies would be determined through the design review and Section 106 processes.

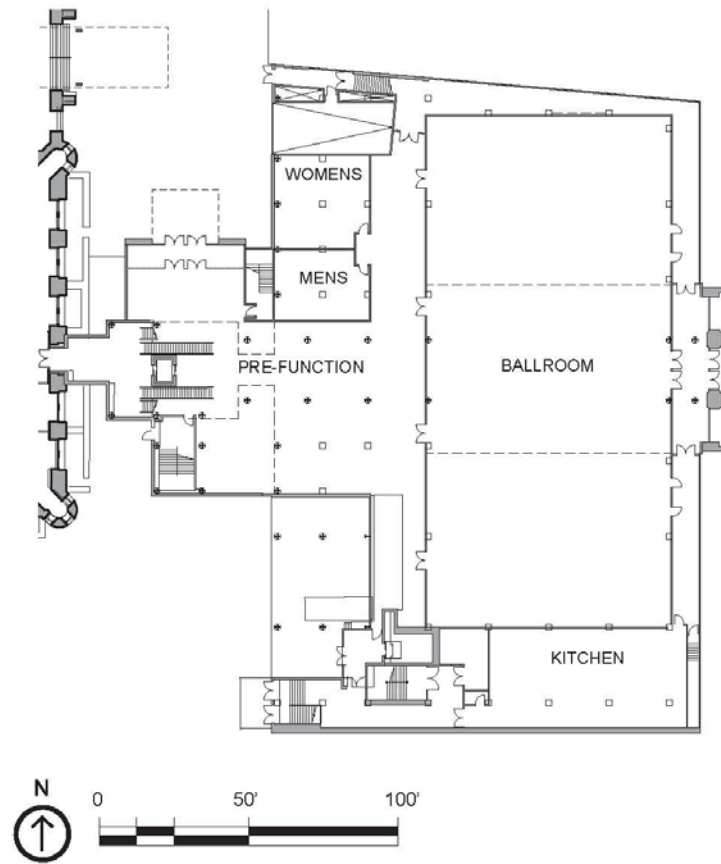
Hotel signage is proposed on the 11<sup>th</sup> Street and Annex entrance canopies, awnings, flags and banners, as well as incorporated within the landscaping. Additionally, signage is proposed within the center archway of the Pennsylvania Avenue entrance and on the truss at the C Street Entrance. Final design of the signage would be determined through the regulatory and design review processes.

The deteriorated awnings over the first floor windows would be removed and new awnings installed.

Lighting consistent with the Federal Triangle and Pennsylvania Avenue designs would also be incorporated around the building to provide more even site lighting.

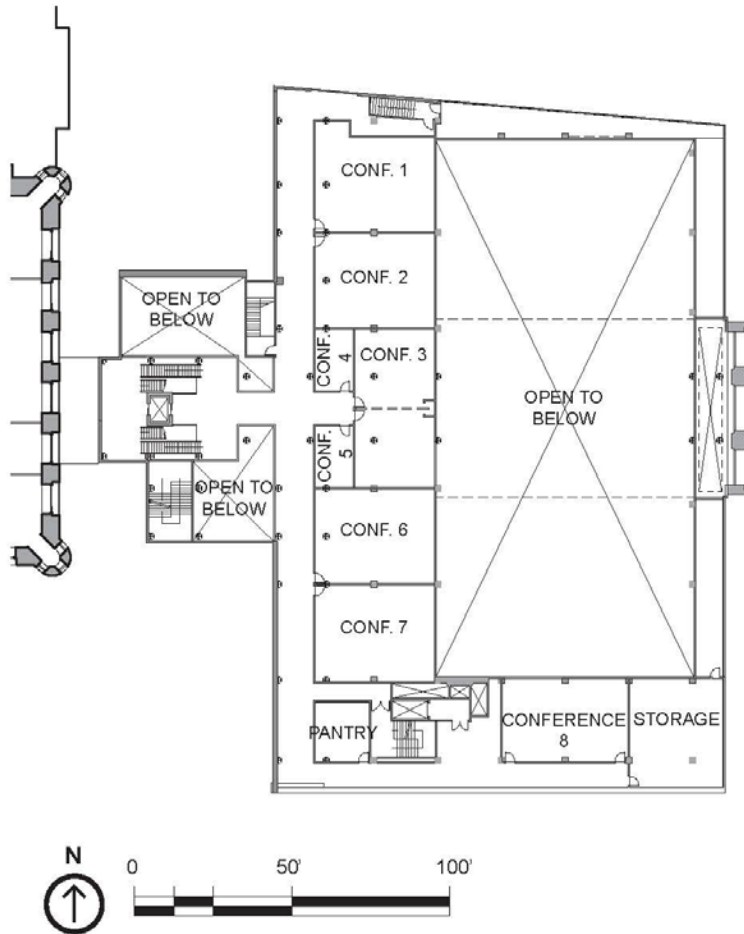
#### The Annex

The central portion of the Annex roof would be lowered and a green roof terrace would be installed, allowing for stormwater management and control. The main body of the Annex would be re-designed and a new façade and canopy would be added at the entrance that serves as the terminus for the 11<sup>th</sup> Street Driveway. The loading dock and access drive for deliveries would continue to be located at the Annex.



**Figure 2-5: Proposed First Floor of Annex**

*Source: Beyer Blinder Belle*



**Figure 2-6: Proposed Second Floor of Annex**

*Source: Beyer Blinder Belle*

### 2.2.4 Public Access and Setting

Under the Action Alternative, the building would become more open to the public, as entrances on all four sides of the building would be opened and security screening equipment would be removed (Figure 2-7).

The redevelopment would include landscaped plazas and public open spaces on the north, east, and south sides of the OPO Building (see Figure 2-8). The preferred selected developer would accommodate the perimeter security needs of the Internal Revenue Service into the OPO landscape design.

#### Pennsylvania Avenue

The Pennsylvania Avenue entrance would be reinstated as the primary pedestrian point of entry. Once inside, visitors could enter on the building's first floor.

Jurisdiction of the sidewalk and plaza area would be transferred from NPS to GSA, which would also transfer management and administration responsibilities.

The existing plaza would remain as it was designed as part of the PADC Pennsylvania Avenue Plan, with its sidewalk pavers, Artwork Pavers, and the statue of Benjamin Franklin as moved there by PADC. In accordance with a congressional joint resolution passed in 1888, the Benjamin Franklin statue would remain in a public space (50 Res. No. 31, July 19, 1888, 25 Stat. 627). The multicolor granite and

brick pavement that was designed by the artist Aleksandra Kasuba would be maintained. Temporary non-fixed seating area would be added to serve the retail and restaurants on the 1<sup>st</sup> floor of the OPO. The area would remain available to the Presidential Inaugural Committee (PIC) to use for inaugural activities.

Six of the seven existing willow oak trees that run along the edge of the Avenue would be maintained; the three honey locusts that border the western edge of the plaza near the intersection of 12<sup>th</sup> Street and Pennsylvania Avenue would also remain.

#### 10<sup>th</sup> Street

The redevelopment of the OPO would reinstate the original connection from the Annex to 10<sup>th</sup> Street through the IRS Building arcade, which would be illuminated by a skylight. This access point would restore the east-west connection as an alternative entrance to and from the Grand Ballroom. In order to mark the access point during special events, temporary and movable pylon signage elements would be placed near this entrance.

#### 11<sup>th</sup> Street

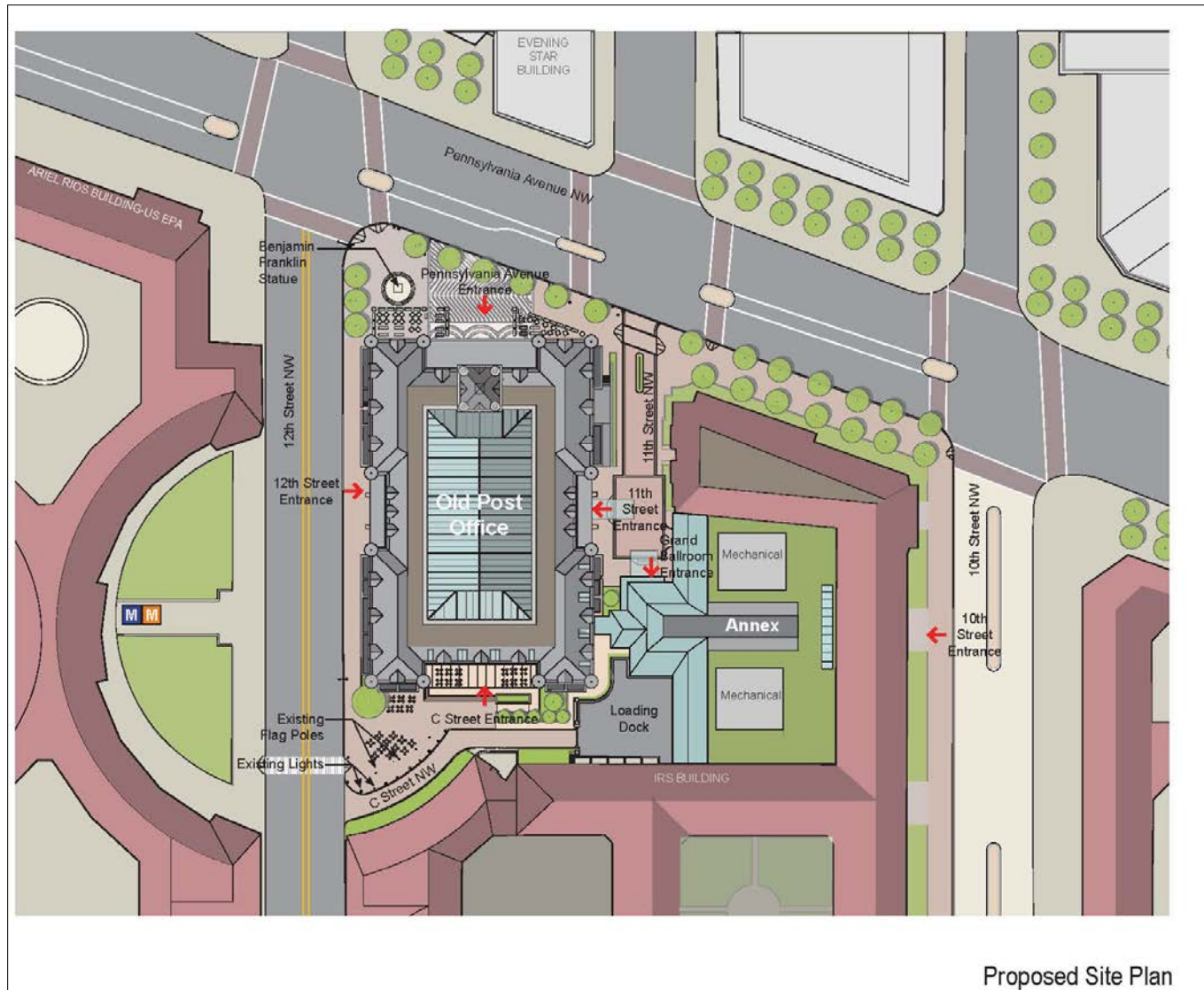
On the east side of the building, in the closed historic L'Enfant Plan right-of-way of 11<sup>th</sup> Street, an access drive would be established that would serve as the primary vehicular access for guest pick-up/drop-off. The



**Figure 2-7: Public Access to OPO Building**

Source: Beyer Blinder Belle





**Figure 2-8: Proposed Site and Landscape Plan**

Source: Byer Blinder Belle

establishment of the drive would require a curb cut be installed on Pennsylvania Avenue which would occur after the NPS transfers jurisdiction of this area to GSA, which would also transfer management and administration responsibilities. The area would remain available to the PIC to use for inaugural activities. The access drive would provide controlled drop-off for taxis and other vehicles, as well as provide access to the valet parking in the basement of the Annex (Figure 2-9). The access drive would be designed with sidewalks on either side providing pedestrian access to the 11<sup>th</sup> Street and Annex Entrances.

Establishment of the drive would require realignment of the granite wall that currently exists at the handicap ramp. Street and plaza trees and the existing kiosk would be removed. These changes would occur after NPS transfers jurisdiction to GSA. The traffic signal box would be relocated and the 11<sup>th</sup> street intersection would be realigned to allow for full movement. A signalized pedestrian crosswalk would be provided where the 11<sup>th</sup> Street driveway intersects with the Pennsylvania Avenue sidewalk.

Two entrances would be provided on the 11<sup>th</sup> Street side of the building. Ascending several steps and passing through the historic 11<sup>th</sup> Street doorway, visitors would enter the OPO on the building's first floor facing the front desk, which once served as the building's historic Stamp Counter. A

handicapped-accessible entrance ramp into the ground floor would also be provided at the 11<sup>th</sup> Street side of OPO.

### C Street

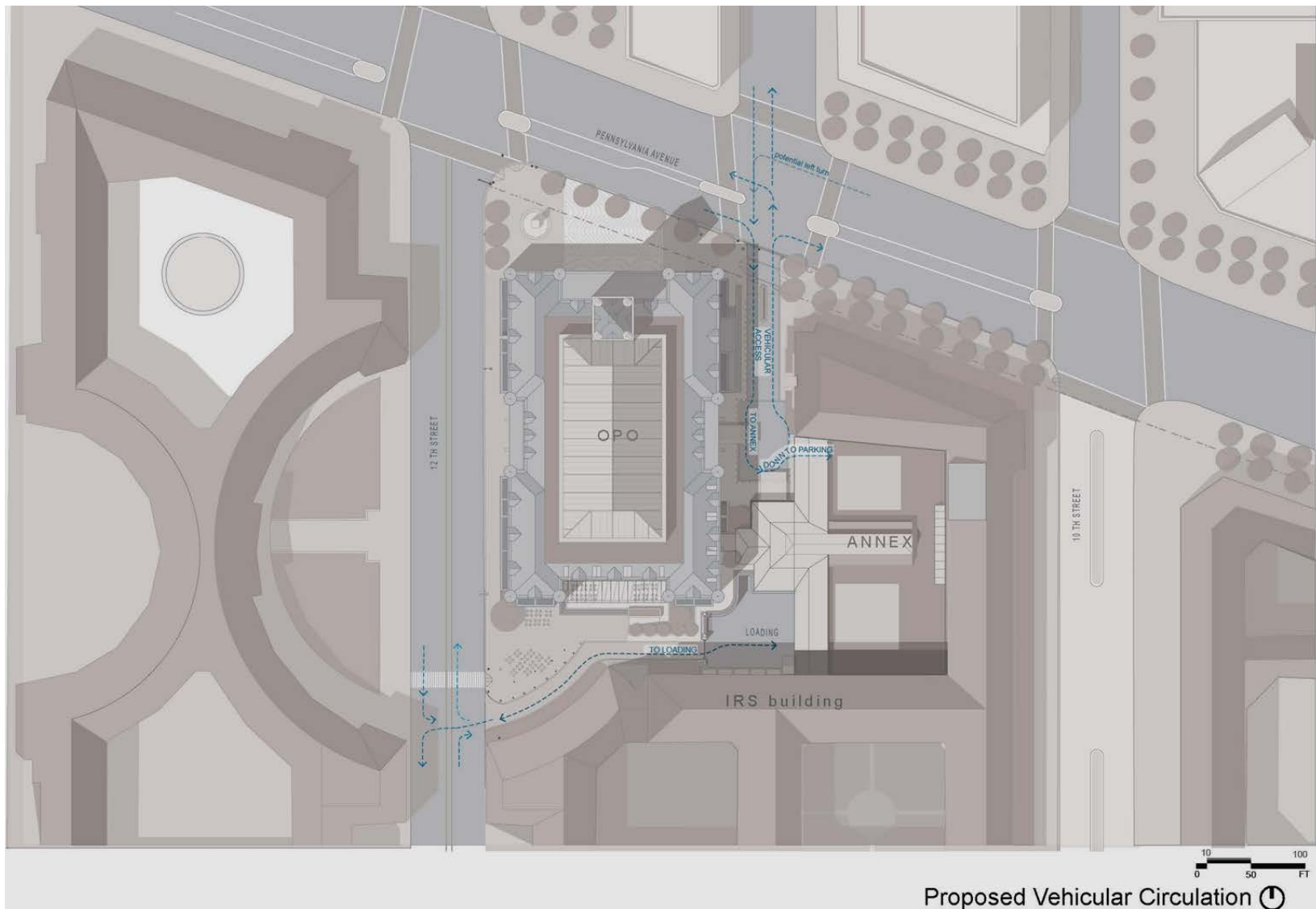
On the south side of the OPO, the C Street entrance would serve as the primary pedestrian entrance from the National Mall and from the Federal Triangle Metro station. This entrance would also serve as the main visitor entrance for the Clock Tower (see Figure 2-7). As indicated by the red line in Figure 2-8, the C Street entrance would provide easy and direct access to the Clock Tower. Additionally, the C Street entrance would provide a second accessible entrance to the building.

The 1980s-era glass and metal enclosure on the south side of the Building, including the rolling metal garage doors, would be removed to reveal the original façade and the historic shed roof (trusses, beams, and ornamental cast iron) would be preserved in place.

Temporary moveable cafe seating and landscape elements would be provided in the C Street plaza. Architectural elements would physically and visually separate the plaza from the service drive

### 12<sup>th</sup> Street

It is anticipated that the 12<sup>th</sup> Street entrance would be used by Metrorail riders disembarking at Federal Triangle. It would provide access to the first floor uses on the west side



**Figure 2-9: Vehicular Access to OPO Building**

*Source: Lee and Associates, Inc.*

of the building, including restaurant and retail space, and the Cortile. Deliveries would be made to the loading dock area of the Annex through the existing service drive accessed off of 12<sup>th</sup> Street.

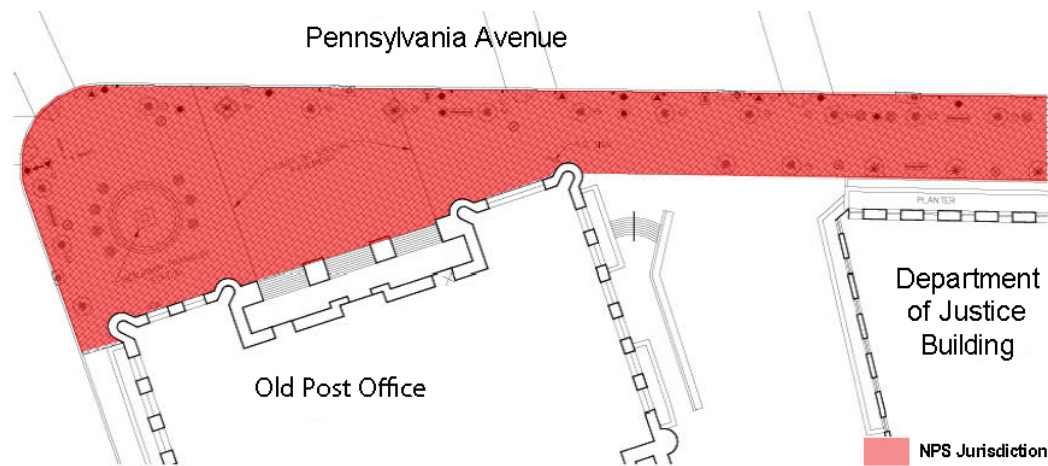
### **2.2.5 National Park Service Transfer of Jurisdiction**

The redevelopment proposes actions on portions of land currently under the jurisdiction of NPS; specifically the introduction of the driveway within the closed historic 11<sup>th</sup> Street right-of-way, installation of a curb-cut and sidewalk cafés on Pennsylvania Avenue. A transfer of jurisdiction from NPS to GSA would be required in accordance with 40 U.S.C. § 8124 before the area can be redeveloped; the land subject to the transfer of jurisdiction to GSA is generally depicted in Figure 2-11 and is approximately 8,300 square feet. Transfer of jurisdiction of the sidewalk café area and the 11<sup>th</sup> Street area would occur as a single transfer. Included in the transfer of jurisdiction are the Benjamin Franklin statue and Aleksandra Kasuba Artwork Pavers (Artwork Pavers). Although GSA would now manage and control this area, the statue and pavers continue to be protected under the Pennsylvania Avenue Plan by PADC and other policies, laws and regulations. This transfer would occur after GSA and NPS agree on covenants including for GSA to facilitate the use of the area for the

Presidential Inauguration. Additionally, the reconfiguration of the intersection may require traffic control devices to be installed or modified on land along Pennsylvania Avenue (south and north sides) that is under NPS jurisdiction. GSA, along with the preferred selected developer, would coordinate with NPS regarding any necessary permits for traffic control devices located on land that is under NPS jurisdiction, but outside the land to be transferred from NPS to GSA. The design of the curb-cut and traffic control devices would also require coordination with the District Department of Transportation.

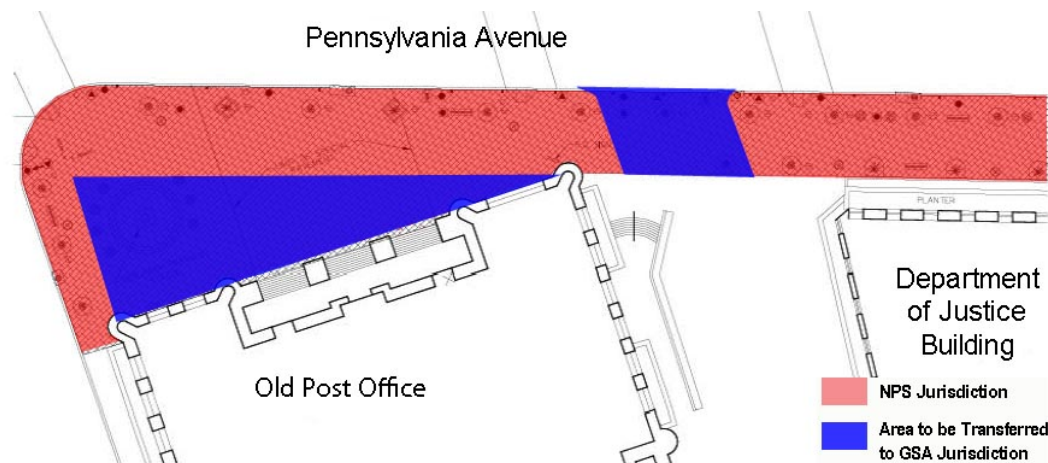
### **2.2.6 Clock Tower Management and Operation**

Under PL 98-1, 97 Stat. 3, at 4, Section 4, (Feb. 15, 1983), directed GSA to execute an agreement with the Secretary of Interior providing for the operation of the observation tower by the NPS. Over the years, GSA and NPS have executed interagency agreements to carry out the obligations as defined in Section 4 of PL 98-1. Under the Action Alternative, GSA and NPS would continue to comply with PL 98-1 through execution of interagency agreements; public access to the Clock Tower would continue to be provided with NPS tours and interpretation for the public. Any changes to NPS' responsibilities would require the agreement to be amended.



**Figure 2-10: Current NPS Jurisdiction Adjacent to the OPO**

Source: AECOM 2103



**Figure 2-11: Approximate Area to be Transferred from NPS to GSA Jurisdiction at the OPO**

Source: AECOM 2103

### 2.3 WHAT IS THE NO ACTION ALTERNATIVE?

Under the No Action Alternative, rehabilitation of the OPO Building would not take place, and the related transfer of jurisdiction from NPS to GSA would not occur. The existing facilities would remain and the current management of the OPO as office and retail space would continue. Repairs and upkeep would continue in accordance with the existing maintenance plan for the site.

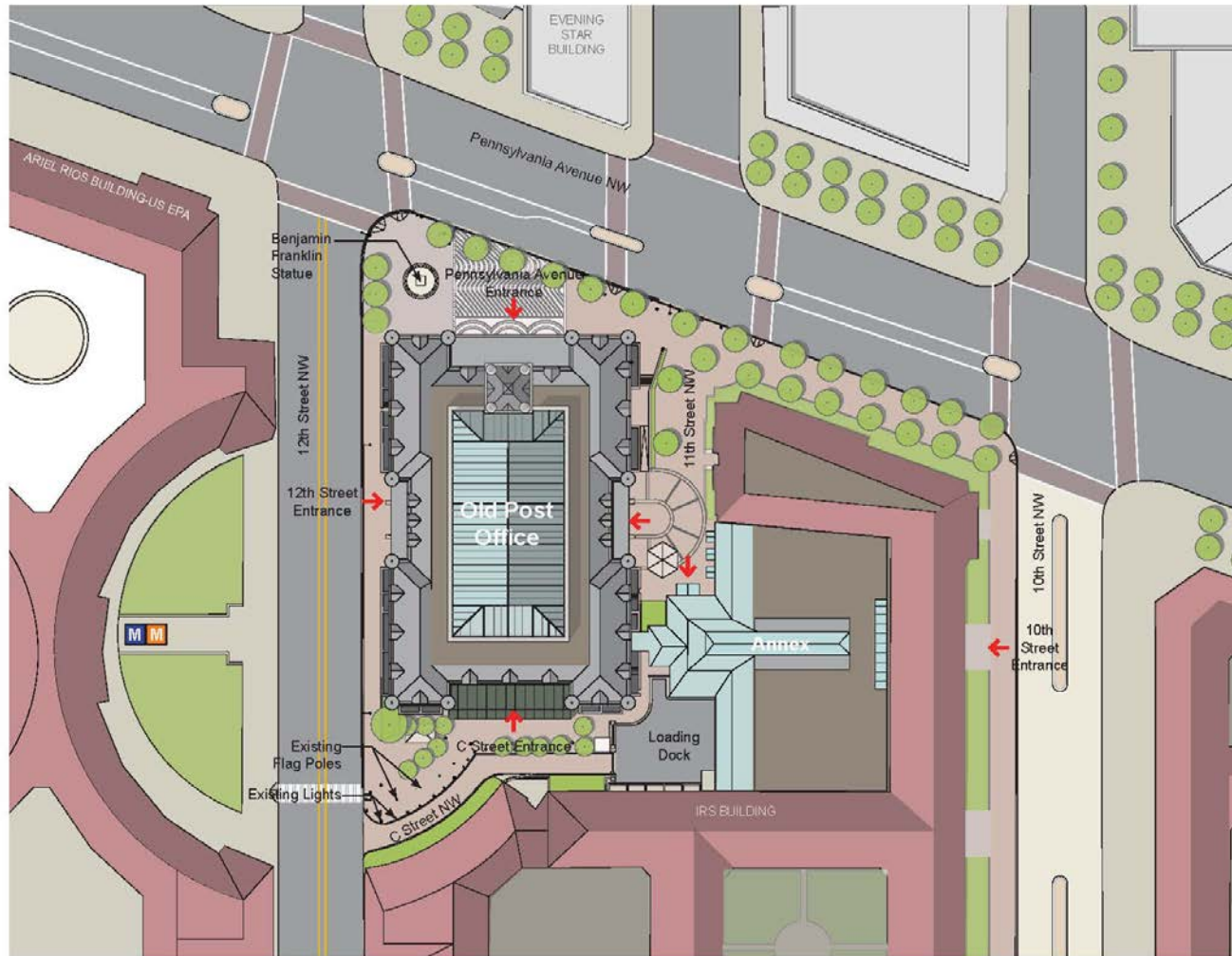
Public access to the OPO would continue from the Pennsylvania Avenue and the C Street entrances and security screening would remain in place. The 12<sup>th</sup> Street entrance would continue to function as an access point for government employees. The NPS would continue to provide tours and interpretation of the Clock Tower for the public per agreement with GSA under PL 98-1, 97 Stat. 3, at 4, Section 4 (Feb. 15, 1983). NPS may make changes to this program if the high levels of visitation by the public continue after the Washington Monument reopens.

Also under the No Action Alternative, no site improvements would be undertaken (Figure 2-11). The existing plaza area, landscaping, and street trees would continue to be administered by the NPS pursuant to NPS authorities, PADC Plan, and applicable laws, regulations and other policies; overall circulation patterns of the site would remain.

CEQ regulations require that federal agencies analyze a No Action Alternative to consider the environmental

consequences of not undertaking the proposed action. Including the No Action Alternative conditions in the environmental analysis provides decision makers the opportunity to understand the environmental consequences of continuing to operate a facility under the existing conditions and management programs. These consequences can then be compared against those of the action alternatives.





Existing Site Plan

**Figure 2-12: Existing Site and Landscape Plan**

*Source: Lee and Associates, Inc.*

## 2.4 HOW DO THE ALTERNATIVES COMPARE WITH EACH OTHER?

The following table (Table 2-2) summarizes each alternative's impacts on the resources studied within this EA. Detailed analysis is included in Chapter 3.

Resource	Action Alternative	No Action Alternative
<b>Land Use</b>	Beneficial direct impacts; negligible and minor adverse indirect impacts*	Negligible impacts
<b>Planning Policies</b>	Beneficial impacts; minor direct adverse impacts	Negligible impacts
<b>Public Space</b>	Minor direct adverse impacts and beneficial impacts	Negligible impacts
<b>Socioeconomics</b>	Short-term minor adverse impacts; beneficial impacts	Negligible impacts
<b>Historic Resources</b>	Short-term adverse impacts due to construction staging. Long-term minor adverse direct impacts to OPO; Minor adverse indirect impacts to the Pennsylvania Avenue National Historic Park, L'Enfant Plan, Federal Triangle Historic District, Aril Rios Building, and Evening Star Building; beneficial impacts to the OPO and Ariel Rios Building; no adverse effect under Section 106	Negligible impacts
<b>Archaeological Resources</b>	Minor adverse impacts	No impacts
<b>Visual Resources</b>	Minor adverse to Pennsylvania Avenue; minor adverse to 12 <sup>th</sup> Street; minor-to-moderate adverse 11 <sup>th</sup> Street	Negligible impacts
<b>Vegetation</b>	Minor adverse impacts	Negligible impacts
<b>Stormwater Management</b>	Short-term minor adverse impacts; long-term beneficial	Negligible impacts
<b>Floodplains</b>	Negligible direct and indirect impacts	Negligible impacts
<b>Air Quality</b>	Negligible impacts	Negligible impacts
<b>Vehicular Traffic</b>	Minor adverse impacts	Negligible impacts
<b>Pedestrian Circulation</b>	Minor adverse and beneficial	Negligible impacts
<b>Public Transportation</b>	Minor adverse impacts	Negligible impacts
<b>Parking</b>	Negligible Impacts	Negligible impacts
<b>Utilities</b>	Short-term minor adverse impacts; long-term beneficial impacts	Negligible impacts
<b>Energy Use and Sustainability</b>	Minor-to-moderate adverse and beneficial	Negligible impacts

**Table 2-2: Comparison of Impacts**

Source: AECOM 2012

\*The impacts identified in the table are considered to be long-term unless otherwise noted.



## **2.5 WHAT IS GSA'S PREFERRED ALTERNATIVE AND WHY WAS IT SELECTED?**

GSA has selected the Action Alternative as the preferred alternative. The Action Alternative is needed to comply with Old Post Office Building Redevelopment Act of 2008 (Public Law 110-359), which mandates the redevelopment of the OPO.

The Action Alternative also fulfills the purpose and need for redevelopment of the OPO as per PL 110-359. This legislation identifies preserving the building's historic integrity and providing a lucrative financial return to the Government as the purpose of the redevelopment. As such, the Action Alternative would maintain and enhance the historic character of the building, better utilize the building space for commercial purposes, and provide a better financial return to the Government. The Action Alternative also provides for NPS to continue to provide public tours and interpretation of the Clock Tower pursuant to PL 98-1 and agreement with GSA.

The Action Alternative would allow GSA to achieve its stated goals and objectives in the redevelopment of the OPO. In addition to those described above, the Action Alternative would enhance public access to the site by removing the need for security screening prior to entering the site, as opposed to the security screening currently required, which would remain as part of the No Action Alternative. The Action Alternative would also contribute

to the vitality of Pennsylvania Avenue, the Federal Triangle, and the District of Columbia by enhancing an iconic building and adding additional attractions and outdoor programming, such as restaurant seating, along public streets. Finally, the Action Alternative would allow GSA to be consistent with a number of Federal and District policies and guidelines, including but not limited to, the *Monumental Core Framework Plan* (2009), *Comprehensive Plan for the National Capital: Federal Elements* (2004), *Comprehensive Plan for the National Capital: District Elements* (2006), the *Pennsylvania Avenue Development Plan* (1976), as amended, and Executive Order 13514: *Federal Leadership in Environmental, Energy and Economic Performance*.

## **2.6 WHAT ALTERNATIVES DID GSA CONSIDER BUT NOT ANALYZE IN DETAIL?**

Through the Section 106 consultation process, consulting parties requested that alternatives for both vehicular and pedestrian circulation be evaluated. To accommodate this request, GSA, along with the preferred selected developer, evaluated different circulation alternatives and presented those during the Section 106 consultation process. This evaluation is described in this section.

### **Vehicular Circulation Alternatives**

Several vehicular circulations options were explored, including a lay-by lane on Pennsylvania Avenue, a lay-by lane on 12<sup>th</sup> Street, and right-in and right-out only movements for the 11<sup>th</sup> Street Drive, and using the C Street entrance as the main vehicular entrance. GSA also explored a no on-site parking alternative. Reasons for not carrying these alternatives forward for additional analysis are summarized below:

**Pennsylvania Avenue Lay-by Lane:** This alternative considered installing a semi-circular driveway in front of the main entrance of the OPO, as it would place hotel guests at the primary historic entrance. It was dismissed from further analysis as it would likely interrupt the pedestrian flow and vehicular traffic on Pennsylvania Avenue and 12<sup>th</sup> Street and introduce two curb cuts mid-block along Pennsylvania Avenue. Additionally, it might also require amending the PADC Pennsylvania Avenue Development Plan and subsequent agency agreements. As a result, NPS, DDOT, CFA, and the historic preservation community indicated that they would not support the alternative. Therefore, GSA dismissed this alternative from detailed analysis within the EA.

**12<sup>th</sup> Street Lay-by Lane:** GSA also explored locating the hotel drop-off and pick-up on 12<sup>th</sup> Street. While the hotel entrance would be visible, the necessary lay-by for taxi and guest queues would affect 12<sup>th</sup> Street traffic. In addition,

the existing sidewalk is ten feet wide and the lay-by lane would significantly decrease sidewalk width, introducing potential congestion between hotel guests and pedestrians. This would not eliminate the need for a drive at 11<sup>th</sup> Street, as a drive would still be needed for entrance to the parking in the Annex. Additionally, discussions with DDOT indicated that DDOT would not support a lay-by lane in this location. As a result, GSA dismissed this alternative from detailed analysis within the EA.

**11<sup>th</sup> Street Restricted Movement:** Similarly, GSA explored restricting the proposed 11<sup>th</sup> Street driveway to right-in, right-out turn movements. In its 2012 traffic impact study, GSA determined that pedestrian safety did not noticeably increase from the right-in and right-out limitation. As a result, GSA dismissed this alternative from detailed analysis within the EA.

**C Street Entrance:** GSA considered utilizing C Street as a driveway. A C Street entrance would eliminate a public plaza, would not be accessible, and would increase traffic on the already busy 12<sup>th</sup> Street. Furthermore, this alternative would also require a curb cut on Pennsylvania Avenue but would draw activity away from Pennsylvania Avenue. As a result, GSA dismissed this alternative from detailed analysis within the EA.

**No On-Site Parking:** GSA explored providing no on-site parking. In consultation with DDOT, it was determined that relying upon valet service to other existing parking garages

would add trips to intersections in the project area in the following ways: guest trips to the site, valet trips to parking garages; valet trips back to site; and the guest trips exiting site. In comparison, on-site parking would generate one guest trip in and one guest trip out. As a result, having no on-site parking would result in greater impacts to traffic in the study area. Also, as the study of the lay-by lane options indicate, there is no good location for a lay-by lane that would allow for the use of valet service to existing commercial parking garages. Therefore, valet service would occur at the curb, potentially blocking lane(s) of traffic. Overall, a no on-site parking option would represent greater impacts to traffic operations than providing valet parking at the site.

### **Pedestrian Circulation Alternatives**

During the Section 106 consultation process, GSA along with the preferred selected developer, included structural and site design analysis and discussion with the DC SHPO and other signatories and with consulting parties regarding the feasibility of creating a pedestrian connection between Pennsylvania Avenue and C Street via the 11<sup>th</sup> Street right-of-way. A number of options were explored to allow for this pedestrian circulation. GSA, through evaluation and discussion of the options in Section 106 consultation meetings, recommended against the creation of a pedestrian passage for the following reasons:

- the level of the water table in relation to the foundation and building piles,
- the potential for intrusions into the historic building fabric either at the east façade or inside the building for an additional or separated opening, potentially endangering the structural integrity of the OPO, and
- the poor quality of the pedestrian experience that would result if a narrow passage were created regardless of other historic preservation concerns.

The signatories and consulting parties agreed that any benefits to a connection would be outweighed by structural or preservation concerns and would be significantly less than what planners had earlier envisioned for pedestrian access in this location through the site. The Monumental Core Framework Plan envisioned the removal of the Annex along with the creation of a robust pedestrian connection north-south through the site; with the retention of the Annex, the connection is not achievable as envisioned in the Framework Plan. Through discussions with consulting parties, Internal Revenue Service, and the preferred selected developer, the reinstatement of the connection from 10<sup>th</sup> Street through the Annex was carried forward as means for improving the perceived porosity of the site. Therefore, GSA dismissed this alternative from detailed analysis within the EA.

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# **3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS**

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### 3.1 WHAT IS THE AFFECTED ENVIRONMENT AND HOW ARE IMPACTS EVALUATED?

In this EA, GSA has combined in Chapter 3 the description of existing conditions (affected environment) and impacts analysis (environmental consequences). For each resource, the affected environment is described first, followed by an analysis of the impacts from the Action Alternative and the No Action Alternative.

The affected environment describes the existing social and environmental resources that may be impacted by the action and no action alternatives. The descriptions focus on those resources that are most likely to be impacted by the alternatives, either adversely or beneficially. As documented in Chapter 1, resources that are not likely to be impacted by either of the alternatives have been dismissed from detailed analysis.

In Chapter 3 the analysis of impacts are characterized by several factors including intensity and duration, as required by CEQ regulations. Definitions of these terms and related assumptions are provided below:

**Impact Intensity** – The intensity of an impact describes the magnitude of change that the impact generates. For the majority of the resource areas, the intensity thresholds are as follows:

- **Negligible:** There would be no impact, or the impact does not result in a noticeable change in the resource;
- **Minor:** The impact would be slight, but detectable, resulting in a small but measurable change in the resource;
- **Moderate:** The impact would be readily apparent and/or easily detectable;
- **Major:** The impact would be widespread and would substantially alter the resource. A major adverse impact would be considered significant as defined in CEQ regulations.

For specific resource areas, such as visual resources, more specific thresholds are necessary. When this is the case, these thresholds are provided prior to the impacts analysis.

**Impact Duration** – The duration of an impact identifies whether it occurs over a restricted period of time (short-term), or persists over an extended period (long-term). For NEPA purposes, short-term impacts would occur during the construction of the improvements, while long-term impacts would occur as a result of operations once the construction is complete. For the purposes of this analysis, impacts are assumed to be long-term unless identified otherwise.

In addition to the factors detailed above, impacts may be characterized as direct, indirect, or cumulative.

- **Direct Impact:** A direct impact is caused by the action and occurs at the same time and place.
- **Indirect Impact:** An indirect impact is caused by the action, but occurs later in time, or farther removed in distance.
- **Cumulative Impact:** A cumulative impact occurs when the proposed action is considered together with other past, ongoing, or planned actions.

Impacts may also be adverse (negative) or beneficial (positive). Adverse impacts would potentially harm resources, while beneficial impacts would improve resource conditions. Within the analysis, impacts are assumed to be adverse unless identified as beneficial.



## 3.2 LAND USE AND PLANNING POLICIES

### 3.2.1 What Land Uses Are Present on the Site and Within the Surrounding Area?

#### Project Site

The OPO occupies the approximate equivalent of one city block within the Federal Triangle in Northwest DC. The OPO is under the jurisdiction of GSA and houses several government agencies, including the Advisory Council for Historic Preservation (ACHP), the National Endowment for the Humanities, and the National Endowment for the Arts. The OPO also contains a food court with approximately fourteen restaurants and approximately eight retail stores. Access for deliveries is available at the south plaza. The Postique, an exhibit within the OPO that interprets the history of the building, is found just inside the Pennsylvania Avenue entrance on the main floor of the Cortile. The NPS provides public tours and interpretation of the Clock Tower, pursuant to PL 98-1, 97 Stat. 3, at 4 Section 4 (Feb. 15, 1983) through an agreement with GSA, and as part of the mission of the Pennsylvania Avenue Historic Site, a portion of which is a unit of the National Park System. In 2012, there were 283,232 public visits to the Clock Tower, an increase of approximately 50,000 public visits from 2011 (NPS 2013). This substantial increase in visitation is attributed to the 2011 closure of the Washington Monument as a result of damage from the August 2011

earthquake. Like the Washington Monument, the Tower provides a panoramic view of the monumental core of Washington, D.C.

Beginning Memorial Day and continuing through Labor Day, the tower is open from 9:00 a.m. to 8:00 p.m., Monday through Saturday, except Thursdays, when the tower closes at 7:00 p.m. for bell ringing practice. On Sundays and Federal Holidays, the tower is open from 12 noon to 6:00 p.m. The last tours go up fifteen minutes before closing. From Labor Day to Memorial Day, the tower is open from 9:00 a.m. to 5:00 p.m., Monday through Saturday. On Sundays and Federal Holidays, the tower is open from 12 noon to 6:00 p.m. The tower is closed on Thanksgiving, Christmas, and New Year's Days. Self-guided tours begin approximately every five minutes from the elevator lobby on the lower level of the OPO. Visitors board the glass elevator to the exhibit area and then follow the signs to gain access to the observation deck. The observation deck is exposed to the elements and may be closed during hazardous weather.

NPS uses numerous staff for the Clock Tower public tour and interpretation operations. Approximately five full-time equivalents (FTEs) are assigned as Park Rangers to the Clock Tower, as is one Park Guide FTE. An additional six seasonal FTEs are employed as Park Guides to support operations for extended summer operations, while one Park Guide FTE is split among four temporary positions to

support operations the rest of the year. An Administrative Clerk FTE is also assigned to the Clock Tower part time.

The agreement pursuant to PL 98-1 between NPS and GSA outlines roles and responsibilities for the management and operation of the Clock Tower. The OPO is managed by GSA; with NPS having responsibility for interpreting the space to the public and providing public tours and interpretation. GSA's responsibilities under the agreement include providing finished space for public access, maintenance services, utility services, and public restrooms. In addition, GSA provides NPS operating and staffing funds for the Clock Tower. NPS's responsibilities include: public tours and interpretation; coordination with the bell ringers, and daily custodial services. NPS is also responsible for supplying an annual Interpretive Operations Plan and budget to GSA. The 2013 interagency agreement is in Section 4.8.

Currently within the OPO, public visits begin with a tour through an exhibit of the history of the OPO Building, the Official Bells of Congress, and the U.S. Postal System. The tour continues up into the tower where the public can attend a bell-ringing performance and also see the bells and panoramic views of the city. The exhibits and exhibit space lack proper exhibit methods and environmental controls, and has outdated technology for interpretive text and media, which lead to deterioration of exhibits. For

example, the platform lighting in the Clock Tower is not fully functional, decreasing the quality of the interpretation.

#### Adjacent Land Uses

Large office buildings primarily characterize the area immediately surrounding the OPO. The Federal Triangle was a principal element of the McMillan Plan, forming a collection of government office buildings between the White House and the U.S. Capitol. Private and federal office buildings are located across Pennsylvania Avenue, north of the OPO; many of the private office buildings contain ground-floor retail. Federal office buildings in the vicinity of the OPO include:

- The Internal Revenue Service Headquarters
- The Ariel Rios Building (Environmental Protection Agency Headquarters), recently renamed the William Jefferson Clinton Federal Building.
- The Ronald Reagan Building and International Trade Center
- The Robert F. Kennedy Department of Justice Building (Department of Justice Headquarters)
- J. Edgar Hoover Building (Federal Bureau of Investigation Headquarters)
- The Federal Trade Commission Headquarters
- The Herbert C. Hoover Building (Department of Commerce Headquarters)

Cultural uses in the vicinity of the site include Smithsonian Institution museums, memorials, and the National Archives. The National Museum of Natural History (NMNH) and the National Museum of American History (NMAH) are located south and southwest, respectively, of the site. The National Museum of African American History is under construction west of the NMAH. The National Archives lies approximately two blocks east of the site along Pennsylvania Avenue. Each of these institutions offers exhibit space, lectures, and other services to the public. The White House, located approximately four blocks northwest of the OPO, is the seat of the Executive Branch and serves as a major cultural institution and offers public tours.

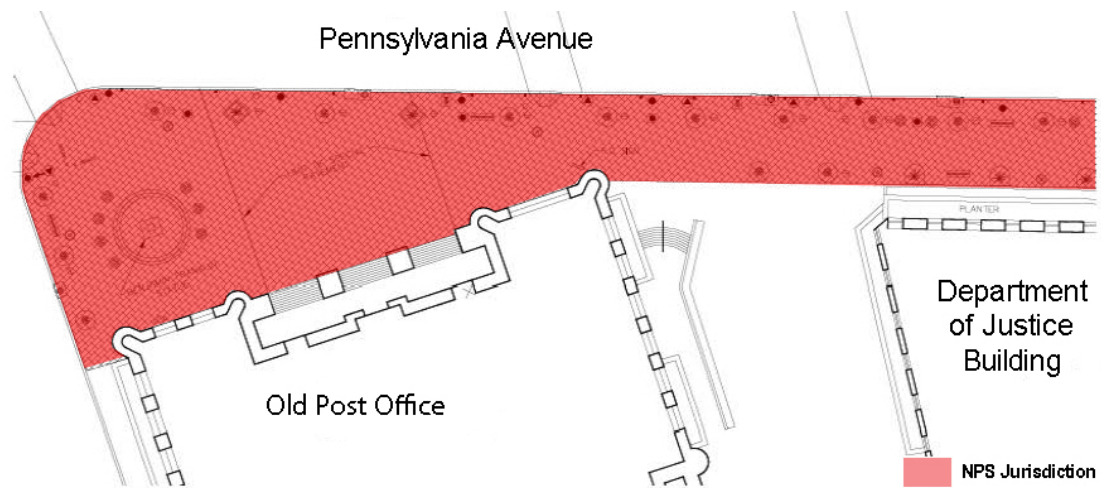
#### NPS Administered Land Uses

Historic sites, memorials, and other visitor amenities are administered by the NPS in the vicinity of the OPO, including the Pennsylvania Avenue National Historic Site, National Mall, White House Visitor Center, Freedom Plaza, and numerous monuments and memorials. These facilities are described below. Additionally, the NPS is involved with the inauguration as it maintains the National Mall, which is used for staging and viewing of the inaugural swearing-in ceremony at the Capitol, and the Pennsylvania Avenue National Historic Site, which is used to view the inaugural parade. NPS also serves as support role to the Presidential Inaugural Committee.

The Pennsylvania Avenue National Historic Site includes the sidewalk, which is currently under the jurisdiction of NPS (see Figure 3-1) directly north of the OPO. The Pennsylvania Avenue National Historic Site preserves locations related to the creation of the Federal City and historically significant events.

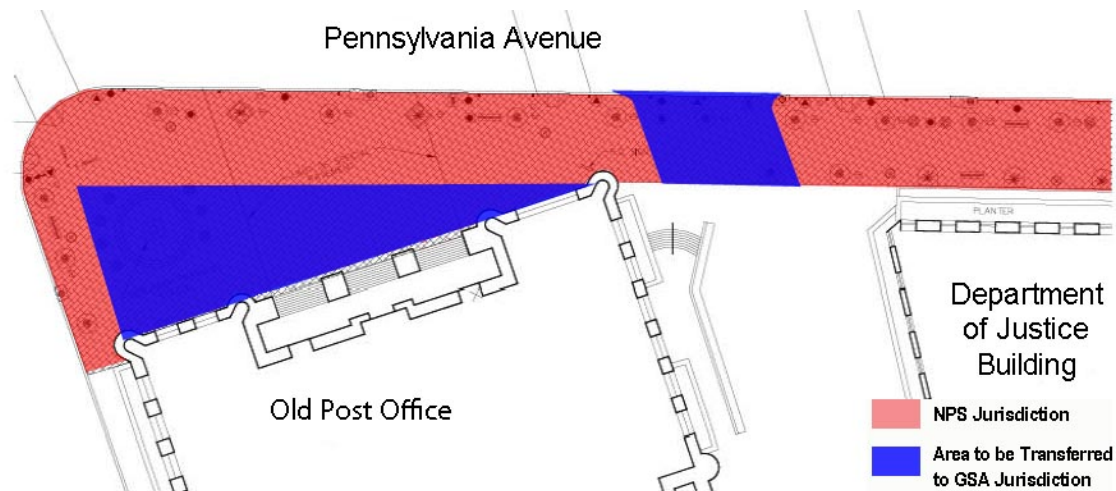
The Pennsylvania Avenue corridor was redesigned and revitalized starting in 1973 by the Congressionally-authorized Pennsylvania Avenue Development Corporation (PADC), which Congress sunsetted in 1996 when the revitalization had been completed. The sidewalks and streetscape on the north side of the OPO Building are within the PADC boundary; the OPO Building and the majority of historic L'Enfant 11<sup>th</sup> Street right of way south of Pennsylvania Avenue is outside the PADC boundary. The area adjacent to the OPO building that is within PADC boundary is generally delineated as the area currently under NPS jurisdiction.

Pennsylvania Avenue serves as the traditional route for inaugural parades, while its adjacent sidewalks are used by onlookers to view the parade. 36 CFR Part 7.96 designates as a regulatory priority specific locations on the sidewalks for Inaugural support structures and bleachers for the Presidential Inaugural Committee and the Armed Forces Inaugural Committee. Specifically, 36 CFR Part 7.96 identifies the area between 12<sup>th</sup> street to the western



**Figure 3-1: Current NPS Jurisdiction Adjacent to the OPO**

Source: AECOM 2013



**Figure 3-2: Approximate Area to be Transferred from NPS to GSA Jurisdiction at the OPO**

Source: AECOM 2013

building line of the IRS Building for several Presidential Inaugural Committee bleachers; this area is currently under NPS jurisdiction.

The NPS' White House Visitor Center is located at street level in the Herbert C. Hoover Building. The NPS offers programs, tours, and interpretive exhibits related to the White House. It is currently under renovation and temporarily closed. A temporary visitor center is located at the NPS' Ellipse Pavilion.

Two blocks south of the OPO lies the National Mall, which serves as a public gathering space and offers multi-purpose recreation opportunities. This expansive open space also serves to link the U.S. Capitol (to the east) with the Washington Monument, and the Lincoln Memorial (to the west).

The U.S. Navy Memorial is located on the north side of Pennsylvania Avenue, directly across from the National Archives. In addition to providing a memorial plaza and commemorative features, the U.S. Navy Memorial also includes exhibit space and lectures in an adjacent office building.

Freedom Plaza, which is two blocks northwest of OPO, offers civic gathering space. It features inlaid stonework depicting significant parts of the historic L'Enfant Plan of the City of Washington, as well as a large fountain and a statue of Casimir (Kazimierz) Pulaski. Further west is

Pershing Park, which features a fountain and a memorial to General John J. Pershing; the General Sherman Memorial; and President's Park South, historically referred to as the Ellipse.

#### Private Land Uses

Hotels and retail space are located along and north of Pennsylvania Avenue in the vicinity around the OPO. The closest is the Hotel Harrington, located at 436 11<sup>th</sup> Street, which has 242 guest rooms. Northwest of the project site along Pennsylvania Avenue, is the JW Marriott Hotel with 737 guest rooms and the historic Willard Intercontinental Washington Hotel with 335 guest rooms. Slightly further west is the W Hotel, located at 515 15<sup>th</sup> Street, with 317 guest rooms. Each of these hotels is full service with restaurants and other facilities, such as retail.

Restaurants and retail space are found in the vicinity north of the Old Post Office. Restaurants range from fast food to upscale dining. Retail uses in the vicinity of the OPO focus on convenience needs (drugstore), souvenir shops, and business support services.

### **3.2.2 How Would Land Uses be Affected by the Redevelopment?**

#### Action Alternative

The Action Alternative would alter the existing land uses at the project site. The proposal would discontinue the office use currently available at the OPO, and would repurpose the space as a hotel with approximately 267 guest rooms, retail and restaurant space, spa, and meeting rooms; the Annex would include a conference facility with ballroom(s), meeting spaces and banquet facilities. The first three levels with existing restaurant and retail space would maintain these uses, although the space would be reconfigured during the building rehabilitation and the tenant mix altered to accommodate a spa, new retail, a club level, back of house spaces, new meeting rooms, and fine dining restaurants. Exhibits from the Postique may be relocated to the ground floor and enhanced to become a curated collection of the Congress Bells Museum.

Public access to the Clock Tower would occur through the C Street (South) entrance. Under the Action Alternative, GSA and NPS would continue to comply with Public Law 98-1 meaning that public access to the Clock Tower would continue, with NPS providing the public with tours and interpretation of the Clock Tower.

GSA and the preferred selected developer would coordinate with the NPS to continue the public's overall experience at the OPO. As required by law, GSA and the Secretary of the Interior (NPS) will continue to comply with the agreement for public tours and interpretation of the Clock Tower, including ongoing operational needs of NPS. The preferred selected developer would be responsible for the capital improvements to the entire building, including the interior of the Clock Tower. Public and support space for the Clock Tower would undergo a renovation, including refreshing of interior finishes (e.g. new paint and carpet). Space for queuing would be provided on the ground floor and restrooms would also be conveniently located for Clock Tower visitors. Improvements to the Clock Tower would be coordinated with NPS. Any such improvements would conform to the Secretary of Interior's Standards for Historic Preservation.

Access to the Pennsylvania Avenue National Historic Site would continue and GSA would require the preferred selected developer to accommodate the placement of temporary bleachers, if requested by the Presidential inaugural Committee for the inaugural parade, consistent with the NPS's regulatory priority at 36 CFR §7.96. The driveway curb cut at 11<sup>th</sup> Street and Pennsylvania is located in a designated inaugural bleacher area for the Presidential Inaugural Committee.

Along Pennsylvania Avenue, one or two restaurants would provide moveable, non-fixed outdoor seating along the north side of the OPO in the area transferred to GSA by the NPS (shown in Figure 3-2), utilizing the additional sidewalk triangle; the standard Pennsylvania Avenue sidewalk line would remain intact and the sidewalk restaurant seating would not impede the Pennsylvania Avenue sidewalk. As indicated in Figure 3-1, this area is under the jurisdiction of the NPS and changes to the use of Pennsylvania Avenue would first necessitate a transfer of jurisdiction from NPS to GSA. As discussed in Section 2.2.5, GSA and NPS would agree on covenants that would be required before the transfer of jurisdiction could occur. In accordance with discussions with NPS, it is anticipated that covenants may include that GSA will ensure appropriate accommodation for bleachers for the Presidential Inaugural Committee. The Artwork Pavers and the Benjamin Franklin statue would remain unchanged.

Although the Action Alternative would represent a change in land use at the existing site, the mix of hotel, exhibition, restaurants, a spa, and retail uses proposed by the Action Alternative are consistent with the existing land uses in the vicinity of the OPO. As per PL 110-359, current federal tenants would be relocated to existing office space within the Washington, DC area, in accordance with the programmatic needs of each agency.

The land use changes as a result of the proposed action would not alter the management of NPS parks and historic sites in the vicinity although NPS will no longer be administering the sidewalk area because NPS is transferring it to GSA (Figure 3-2). In addition to the Clock Tower and Pennsylvania Avenue National Historic Site, the National Mall would continue to be operated by the NPS pursuant to the Mall Plan for the benefit of the public. The U.S. Navy Memorial and Freedom Plaza would continue existing operations and the Washington Monument would resume operations once it reopens. The Action Alternative would not alter the use of the White House Visitor Center in its temporary location nor in its permanent location when it reopens, once construction work is completed.

The Action Alternative would alter the hotel environment in the nearby area. The Willard, JW Marriott, the W Hotel may potentially lose some customers to the proposed hotel in the OPO. However, the OPO would help create a concentration of hotel and visitor amenities along Pennsylvania Avenue, and improve the overall experience of visitors to the area. Such competition would, over time, likely cause existing hotels to improve their private facilities. Similarly, the replacement of existing retail stores and food court tenants with higher-end retail and restaurants would create a concentration of such retail and restaurants in the vicinity over time. Due to the overall visitor attractions in the vicinity of the OPO, it is anticipated

that a demand for fast food and souvenir stores in the immediate area would continue.

Overall, the redevelopment of the OPO would result in beneficial direct impacts on land uses of the site, including the proposed improvements to the exhibition space for the Clock Tower. The redevelopment will result in negligible indirect impacts on nearby NPS parkland activities, including the Pennsylvania Avenue Historic Site from which NPS will be transferring the area in front of OPO to GSA. There would be no impacts to the National Mall and the Navy Memorial. As a result of the potential changes to hotel and retail uses, there would be minor indirect impacts on land use from the Action Alternative.

#### No Action Alternative

Under the No Action Alternative, no interior rehabilitation of the building would occur. The existing office and retail uses would continue, as would the public access of the Clock Tower with tours and interpretation provided by the NPS pursuant to agreement with GSA under PL 98-1. As a result, there would be negligible impacts on land use.

#### **3.2.3 What Measures Would be Undertaken to Reduce Impacts to Land Use?**

Redevelopment activities proposed for land currently under NPS jurisdiction would first require a transfer of jurisdiction from NPS to GSA. The exact area of land to be transferred from NPS to GSA will be determined by NPS. It is anticipated that at a minimum it will include the area along Pennsylvania Avenue proposed for sidewalk cafes and for the 11<sup>th</sup> Street Driveway.

GSA and NPS would coordinate on the process and covenants that will be required for the transfer of jurisdiction associated with the redevelopment of the OPO.

Concerning the Clock Tower, the most recent agreement between NPS and GSA became effective on February 27, 2013 with its execution by GSA. GSA and NPS will continue to comply with PL 98-1 by entering into these agreements.



### 3.2.4 What are the Federal and Local Plans and Policies that are Relevant to the Redevelopment?

#### Comprehensive Plan for the National Capital, Federal Elements

The *Comprehensive Plan for the National Capital, Federal Elements* is used by NCPC as the primary planning tool and guide for federal facilities in Washington, DC. Goals, objectives, and planning policies for the growth and development of the Nation's Capital are included in the Plan. Several of the Federal Elements are of particular relevance to the proposed OPO improvements: the Federal Environment Element, the Preservation and Historic Features Element, and the Federal Visitor Attraction Element.

The Federal Environment Element states that the federal government should:

- Minimize power generation requirements, such as by utilizing best available “green” building systems and technologies.
- Encourage the development and use of alternative energy sources to reduce the reliance on fossil fuels.
- Promote indoor air quality by using environmentally friendly (“green”) building materials, construction methods, and building designs.

- Promote the use of new water-saving technologies that conserve and monitor water consumption.
- Encourage the use of innovative and environmentally friendly “Best Management Practices” in site and building design and construction practice, such as green roofs, rain gardens, and permeable surface.
- Enhance the environmental quality of the national capital by replacing street trees where they have died or where they have been removed due to development.
- Encourage the use of native plant species, where appropriate.

The Preservation and Historic Features Element states that the federal government should:

- Protect and enhance the vistas and views, both natural and designed that are an integral part of the national capital's image.
- Promote continuity in the historic design framework of the nation's capital by protecting and enhancing the elements, views, and principles of the L'Enfant Plan.
- Protect the settings of historic properties, including views to and from the sites where significant, as integral parts of the historic character of the property.

- Use historic properties for an adaptive use that is appropriate for the context and consistent with the significance and character of the property.
- Plan for federal historic properties to serve as catalyst for local economic development and tourism.

The Federal Visitor Attractions Element states that the federal government should:

- Support publicly accessible federal visitor attractions on federal property throughout the region.

*Comprehensive Plan for the National Capital: District Elements*

The *District Elements* of the Comprehensive Plan serve to guide planning decisions pertaining to non-federal lands and facilities within the District of Columbia. Updated in 2006, the *District Elements* are comprised of Citywide and Area Elements. The policies set forth in the Area Elements are “place-based”, non-prescriptive, and seek to provide a sense of local priorities and to recognize the varying dynamics at work in each part of the city.

The Federal Triangle, in which the project site is situated, is located within the boundaries of the “Central Washington” Area Element. Relevant Policies and Actions recommended

under this Element pertain to pedestrian experience, transportation, and urban design standards.

Policy CW-1.1.17: *Making Central Washington’s Streets More Pedestrian-Friendly* seeks to enhance Central Washington’s pedestrian network and improve pedestrian safety. Recommended measures include:

- Improving certain streets for pedestrian use;
- Providing safe and accessible pedestrian waiting space on the widest thoroughfares;
- Maintaining sufficiently wide sidewalks and regulating sidewalk obstructions;
- Restricting curb cuts and parking garage access along major streets;
- Providing safe and accessible pedestrian detours at construction sites;
- Encouraging sidewalk widening within private development; and
- Enforcement of traffic and parking laws, such as no parking zones.

Policy CW-1.1.10: *Central Washington Hotels and Hospitality Services* recommends the following approach:

“Encourage the development of additional hotels in Central Washington, especially in the areas around the new Convention Center and Gallery Place, along Pennsylvania Avenue NW and Massachusetts Avenue NW, in the Thomas Circle area, and in the

area east of Third Street NW. A range of hotel types, including moderately priced hotels, and hotels oriented to family travelers as well as business travelers, should be encouraged. Hotels generate jobs for District residents and revenues for the general fund and should be granted incentives when necessary. Retain existing hotel uses by allowing and encouraging the expansion of those uses.”

Policy CW-1.1.14: *Central Washington Multi-modal Transportation System* addresses transportation issues and upgrades and aims to:

“Develop and maintain a balanced multi-modal transportation system for Central Washington which makes optimal use of the existing street network, the Metrorail and commuter rail networks, the bus system, and public spaces including sidewalks and alleys. Mass transit should be supported as the dominant form of transportation to, from, and around the area.”

Action CW-1.1.C: *Central Washington Urban Design Planning* recommends the following actions:

“Continue to develop plans and guidelines for the design of buildings, streets, and public spaces in Central Washington. Design guidelines should help implement the Comprehensive Plan by reinforcing the unique identity of Central Washington’s sub-

areas and neighborhoods, improving connections to the National Mall, encouraging pedestrian movement, creating active street life, preserving historic resources, promoting green roofs and other sustainable design principles, and achieving high quality architectural design.”

Additional policies under the Historic Preservation, Parks, Recreation and Open Space, Environmental Protection and Urban Design Elements are further applicable to the OPO redevelopment project. These include:

Policy E-1.1.1: *Street Tree Planting and Maintenance*

“Plant and maintain street trees in all parts of the city, particularly in areas where existing tree cover has been reduced over the last 30 years. Recognize the importance of trees in providing shade, reducing energy costs, improving air and water quality, providing urban habitat, absorbing noise, and creating economic and aesthetic value in the District’s neighborhoods.”

Policy E-3.1.1 *Maximizing Permeable Surfaces*

“Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff.”

Policy E-3.1.2: *Using Landscaping and Green Roofs to Reduce Runoff*

“Promote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces.”

Policy HP-2.3.5: *Enhancing Washington’s Urban Design Legacy*

“Adhere to the design principles of the L’Enfant and McMillan Plans in any improvements or alterations to the city street plan. Where the character of the historic plan has been damaged by intrusions and disruptions, promote restoration of the plan through coordinated redevelopment and improvement of the transportation network and public space.”

Policy HP-2.5.4: *Landscaped Yards in Public Space*

“Preserve the continuous and open green quality of landscaped front and side yards in public space. Take special care at historic landmarks and in historic districts to protect this public environment from intrusions, whether from excess paving, vehicular access and parking, high walls and fencing,

or undue disruption of the natural contours or bermed terraces.”

Policy UD-3.1.2: *Management of Sidewalk Space*

“Preserve the characteristically wide sidewalks of Washington’s commercial districts. Sidewalk space should be managed in a way that promotes pedestrian safety, efficiency, comfort, and provides adequate space for tree boxes. Sidewalks should enhance the visual character of streets, with landscaping and buffer planting used to reduce the impacts of vehicle traffic.”

Policy UD-3.1.10: *Sidewalk Cafes*

“Discourage the enclosure of sidewalk cafes in a manner that effectively transforms them into indoor floor space. The design of sidewalk cafes should be compatible with the architectural qualities of the adjoining buildings, should complement the street environment, and should not impede pedestrian movement.”

Policy UD-3.1.13: *Signage*

“Encourage high standards of signage throughout the District, particularly for signs that designate landmarks, historic districts, and other areas of civic importance.”

*Monumental Core Framework Plan*

The *Monumental Core Framework Plan*, published in 2009, offers a comprehensive approach to easing demand for construction on the National Mall while creating lively urban spaces throughout the city. The result of collaborative planning efforts between NCPC and the U.S. Commission of Fine Arts (CFA), the Framework Plan provides a blueprint for creating new destinations for cultural attractions throughout the city, and improving connections among them. Further, the Framework Plan serves as a tool to guide strategic decisions to coordinate federal and local interests, identifying opportunities to coordinate land use, urban design, and transportation improvements.

The principal goals of the *Framework Plan* are to:

- Plan for the future needs of the federal government, including space for new memorials, museums, public gathering spaces, and federal offices in a way that contributes to sustainable city life;
- Preserve the historic open space of the National Mall and protect it from overbuilding; and
- Extend the special civic qualities of the National Mall and the vitality and vibrancy of the city into the adjacent federal precincts.

The *Framework Plan* identifies four major precincts surrounding the National Mall that are targeted for revitalization as new cultural centers and destinations that exude special civic qualities. The four precincts are: Northwest Rectangle, Federal Triangle, Southwest Rectangle, and East Potomac Park. The *Framework Plan* examines opportunities to enhance these precincts in new ways to meet the future needs of the federal government, while also protecting the city's open space and public realm.

*The Framework Plan* seeks to reconnect the downtown with the National Mall through the Federal Triangle. The *Framework Plan* specifically states that the Federal Triangle should: “exhibit the purpose of the federal government, America’s diverse national heritage, and the best of American art, architecture, landscape architecture, and urban design. It should have lovely and animated city streets and public spaces; welcoming public buildings; flexible and convenient public transit service; sustainable and accessible streets and buildings; and federal, local, and private development.” Specific strategies to achieve this goal include the following:

- Establish a new destination on Pennsylvania Avenue by concentrating a mix of office, culture and hospitality uses on Pennsylvania Avenue between 9<sup>th</sup> and 12<sup>th</sup> Streets, NW;

- Enhance the public realm by establishing a welcoming, interconnected system of lively and beautiful streets, introducing sustainable public spaces, and improving the pedestrian experience and symbolic importance of Pennsylvania Avenue and the Federal Triangle.

The *Framework Plan* specifically identifies the Old Post Office for mixed use redevelopment. The Plan recommends “the development of a mixed-use destination on Pennsylvania Avenue between 9<sup>th</sup> and 12<sup>th</sup> Streets at the current location of the Old Post Office Building and the J. Edgar Hoover Building” in order to better integrate Pennsylvania Avenue and the Federal Triangle.

#### Pennsylvania Avenue Plan

The Pennsylvania Avenue Development Corporation (PADC) was established by Congress through Public Law 92-578, 86 Stat. 1266, § 2, (Oct. 27, 1972). Congress determined that it was in the national interest for the area adjacent to Pennsylvania Avenue between the Capitol and the White House to be developed and used in a manner suitable to its ceremonial, physical, and historic relationship to the legislative and executive branches of the Federal Government. PADC was commissioned to improve the area along Pennsylvania Avenue, which was in poor condition. The OPO Building is not located within the PADC boundary and thus not subject to PADC guidelines;

however the area to be transferred by NPS to GSA is within PADC boundary and is subject to the PADC’s Pennsylvania Avenue Plan and the applicable laws, regulations, and policies. The NPS acquired this area when Congress sunsetted PADC through PL 104-134, April 26, 1996. GSA, NPS, and NCPC, as the successor agencies to the PADC and pursuant to a Memorandum of Agreement signed in 1996, are required to review proposed alterations within PADC boundaries for consistency with the Plan, and seek an amendment if the proposed action is deemed not consistent.

Building on previous planning efforts, the PADC developed the *Pennsylvania Avenue Plan* in 1974. It has since been amended. The *Pennsylvania Avenue Plan and Guidelines (the Pennsylvania Avenue Plan)* called for altering the original 160 foot width of the Pennsylvania Avenue in order to accommodate wider sidewalks, although this would not be undertaken where existing buildings with historic and architectural value were to be preserved. The plans identified widening the south sidewalk of Pennsylvania Avenue by trimming up to 7.5 feet from the roadway while adding a double row of trees. This was intended to make the Avenue’s broad expanse less of a physical and visual barrier. PADC designed and revitalized the Pennsylvania Avenue corridor through the development of a landscape plan that includes pavers, plantings, public plazas, and public art.

The 11<sup>th</sup> Street right-of-way was closed when planning and construction of the Federal Triangle began in the 1920s; however, the cartway continued to be used by vehicles after the Internal Revenue Service Building was constructed and occupied. During the implementation of the Pennsylvania Avenue Plan, the Pennsylvania Avenue sidewalk was redesigned with a new sidewalk across the closed 11<sup>th</sup> Street right-of-way, creating a two-block-long sidewalk, which is the current condition.

The current space between the Old Post Office and the IRS Building is the result of two eras of planning history in Washington: 1) the incomplete implementation in the 1930s of the Federal Triangle buildings and designed open spaces to replace the nineteenth-century development of downtown blocks in the L'Enfant Plan; and, 2) the decision in the 1970s to preserve and rehabilitate the Old Post Office rather than demolish it to complete the Federal Triangle. The result, underscored by the 1992 construction of the Annex, created a condition whereby two buildings of different eras, originally built on different blocks separated by 11<sup>th</sup> Street, NW, are joined by a two-block-long segment of the Pennsylvania Avenue sidewalk, spanning a plaza between the two buildings.

*The Pennsylvania Avenue Plan* also defined lighting for the area to achieve important objectives. The street itself would be lit by a continuous row of bright fixtures, reinforcing the vista between the White House and the

Capitol. Individual buildings, monuments, fountains and major landscaped areas would be specially lit to make them stand out. Finally, pedestrian areas would be lit to a greater intensity than the street, enhancing pedestrian safety and thereby increasing night-time activity along the Avenue. Specific streetscape elements are also identified in the Plan.

*National Park Service Plan for Pennsylvania Avenue NHS*

The NPS is preparing a long-term plan for the future management and use of the area to ensure the continued operation of Pennsylvania Avenue as the nation's "Main Street," where Inaugural Parades, First Amendment marches, and state funerals occur; where nationally significant commemorative works and their settings are preserved; and where nationally significant people or events will be commemorated. Pennsylvania Avenue National Historic Site extends from the U.S. Capitol to the White House. Managed by the National Park Service as part of the national park system, the national historic site is composed of separate park areas, plazas, sidewalks, special lighting, trees, sculpture, and memorials. The largest park areas are John Marshall Park, the United States Navy Memorial, Freedom Plaza, and Pershing Park. Spectacular views are available of the U.S. Capitol at the southeast end of Pennsylvania Avenue, along a view corridor that dates back to the 1791 L'Enfant plan for Washington, D.C. NPS is developing this plan through the NEPA process.

*District of Columbia Bicycle Master Plan*

The District of Columbia's *Bicycle Master Plan* establishes recommendations for bicycle facilities within DC. According to the *Bicycle Master Plan*, one recommendation is that:

- DDOT will encourage building managers and property owners to provide bicycle parking as required by DC regulations. Bicycle parking must be provided in parking garages, and it must be designated by prominent signage. Zoning requirements for bicycle parking will be enforced.

Bike lanes run along Pennsylvania Avenue. As such, the following policy is relevant to the OPO:

- Facilitate and support the development of regional and national trail routes through the District of Columbia.

*DC Department of Transportation Design and Engineering Manual*

The DDOT *Design and Engineering Manual* establishes standards for sidewalks and tree boxes that are relevant to the detailed design of the proposed project. In particular, the document provides guidance on sidewalk widths under differing conditions, and guidance on the size and spacing of street trees.

*Tree Removal Permit*

The Urban Forestry Administration, acting under DDOT, requires permits for the removal of street trees in DDOT public right of way. The Urban Forest Preservation Act of 2002, effective June 12, 2003 (D.C. Law 14-309; D.C. Official Code 8-6501.01 *et seq.* (the act)), established an urban forest preservation program requiring a Special Tree Removal Permit prior to the removal of a tree with a circumference of 55 inches or more, regardless of location, in addition to requiring a permit for the removal of trees within the DDOT public right of way. If a tree removal permit is approved, the Urban Forestry Administration would require the replacement of lost trees (based on caliper), either on the site or in a comparable area.

*Public Law 98-1*

Public Law 98-1, 97 Stat. 3, at 4, Section 4 (Feb. 15, 1983), designates the OPO Building, the pedestrian plaza by the Annex, and the adjacent grounds as the Nancy Hanks Center. The law also requires GSA to erect suitable markers of the accomplishments of Nancy Hanks in the fields of government and describing her actions that led to the renovation of the OPO Building. Currently, the building has plaques commemorating Nancy Hanks's accomplishments. Public Law 98-1 also requires the execution of an agreement between the Secretary of Interior and GSA for the operation of the Clock Tower, which has been interpreted as an agreement for NPS to



provide public tours and interpretation and support services in the Clock Tower.

#### Executive Order 13514

In October 2009, Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, was issued, directing all federal agencies to strengthen their sustainable practices. The order expands upon the Energy Independence and Security Act, the Energy Policy Act of 2005, and Executive Order 13423 by requiring federal agencies to implement strategies that measure, manage, and reduce greenhouse gas emissions, water consumption, and diversion of materials. The order mandates federal agencies to meet various energy and environmental targets and defines requirements for sustainability in buildings and leases, sustainable acquisition, and electronic stewardship. Goals that are particularly relevant to the site improvements at the Old Post Office include:

- Reduce the use of fossil fuels.
  - Improve water use efficiency and management by:
    - Reducing potable water consumption intensity by 2% annually through fiscal year 2020;
    - Reducing agency industrial, landscaping and agricultural water consumption by 2% annually;
- Identifying, promoting, and implementing water reuse strategies that reduce potable water consumption;
  - Minimize the generation of waste and pollutants through source reduction.
  - Ensure 95% of all new contracts, including non-exempt contract modifications, require products and services that are energy-efficient, water-efficient, biobased, environmentally preferable, non-ozone depleting, contain recycled-content, non-toxic or less-toxic alternatives.
  - Ensure at least 15% of existing buildings and leases (>5,000 gross sq ft) meet the Guiding Principles by FY2015, with continued progress towards 100%.
  - Pursue cost-effective, innovative strategies, such as highly reflective and vegetated roofs, to minimize consumption of energy, water, and materials.
  - Managing existing building systems to reduce the consumption of energy, water, and materials, and identify alternatives to renovation that reduce existing assets' deferred maintenance costs; ensure that rehabilitation of federally-owned historic buildings utilize best practices and technologies in retrofitting to promote long-term viability of the buildings.
  - Advance regional planning and local integrated planning by:

- Participating in regional transportation planning and recognizing existing community transportation infrastructure;

### Zoning

The OPO, a federally owned property in the District of Columbia, is not subject to local zoning regulations. The National Capital Planning Commission (NCPC) instead regulates new design and renovation of federal buildings in the Nation's Capital, pursuant to the National Capital Planning Act (40 USC §8701) and the District of Columbia Zoning Enabling Act of 1938 (ch. 534, 52 Stat.802 and DC ST § 6-641.15). Expressed in these Acts, NCPC holds "in lieu of zoning" approval authority for height, bulk, number of stories, and open space for projects on federal property. NCPC makes decisions regarding these attributes on a case-by-case basis.

In 2012, the District of Columbia rezoned the OPO site to C-4 within the Downtown District Overlay Zone. On January 10, 2013, NCPC approved the conditional rezoning of the OPO site (see Chapter 4.6). C-4 zoning allows for office, retail and hotel uses in this district as a matter of right. Despite the recent zoning designation by the District of Columbia, the redevelopment project as it would occur on federally-owned property remains subject to NCPC's in-lieu of zoning authority and is not subject to local zoning.

In addition, GSA's Facilities Standards for the Public Buildings Service (P100) establishes design standards and building criteria work in historic structures and other construction activities, and are therefore applicable to the project. As called for in 40 USC § 3312, GSA is required to consider, but is not subject to, zoning laws and those regulations related to landscaping, open space, building heights, and other similar laws.

### 3.2.5 Would the Improvements Comply with Federal and Local Plans and Policies?

#### Action Alternative

The rehabilitation of the OPO would be consistent with the *Federal Elements of the Comprehensive Plan for the National Capital* by ensuring that the rehabilitation and reuse of the OPO would use sustainable design principles established in the Leadership in Energy and Environmental Design for New Construction and Major Renovation Projects (LEED-NC) standard; adaptively reusing a historic property; and minimizing changes to the exterior of the building. The energy efficiency of the building would improve, and the preferred selected developer would explore the purchase of energy derived from alternative sources to reduce consumption of non-renewable energy resources.

The rehabilitation of the OPO is consistent with the policy to use historic properties to support local economic development and tourism by continuing to promote retail uses, although altered, and offering a hotel at the site. The main entrances to the building would no longer require security screening, improving public access to the building. New moveable and non-fixed outdoor restaurant seating, signage, and other entry identification would alter the views from some points along Pennsylvania Avenue at the periphery of the view corridor.

The Action Alternative would generally be consistent with the *District Elements of the Comprehensive Plan for the National Capital* by maintaining pedestrian amenities and circulation at the OPO; adding bike facilities on-site; utilizing green roofs; and providing additional hotel space in Washington, DC. The moveable, non-fixed outdoor seating areas proposed for the Pennsylvania Avenue sidewalk directly north of the building would be compatible with public space, and would serve to activate the area as called for in the *District Elements*. Additionally, the rehabilitation of the OPO would maintain the iconic architecture of the OPO. The establishment of a driveway at 11<sup>th</sup> Street on the south side of Pennsylvania Avenue would reestablish a curb cut in the location of a former curb cut and L'Enfant Plan street, the former fourth leg of what is currently a three-way intersection; however, interrupting the sidewalk with a curb cut is inconsistent with the District Elements. Also, the introduction of moveable, non-fixed outdoor restaurant seating at the C Street plaza would utilize public space and, pending formal closure of C Street, would require a public space permit. GSA is in the process of completing the closure of a portion of C Street, which was initiated in 1986. Pending formal closure of C Street, the preferred selected developer would be required to obtain a public space permit for activities in the portion of C Street under DDOT's jurisdiction.

The rehabilitation of the OPO under the Action Alternative would help fulfill with the *National Capital Framework*

*Plan's* vision for the project site and the Federal Triangle by activating the Pennsylvania Avenue corridor through a vibrant mix of uses. Specifically, the reuse of the OPO as a hotel with associated retail and restaurant uses under the Action Alternative is called for in the *Framework Plan*.

The Action Alternative would be consistent with a number of other planning policies. The Action Alternative would provide bicycle parking in the parking garage, in accordance with the *District of Columbia Bicycle Master Plan*. Necessary permits would be received from the Urban Forestry Administration, under the DC Department of Transportation, before the removal of street trees in DDOT public right of way or trees with a circumference of 55 inches or more. In accordance with Public Law 98-1, identification and acknowledgment of the works of Nancy Hanks would be provided; however, it may not resemble the existing signage. The building would be consistent with Executive Order 13514 through the use of best management practices, including reducing stormwater runoff through the use of a green roof at the Annex. The establishment of a driveway at Pennsylvania Avenue and 11<sup>th</sup> Street and the Pennsylvania Avenue sidewalk cafes would first require a transfer of jurisdiction from NPS to GSA which pursuant to 40 USC § 8124 requires agreement between NPS and GSA as to the terms of the transfer and recommendation by NCPC.

The proposed redevelopment would result in specific beneficial impacts from consistency with Executive Order 13514, the policies contained in the *Federal* and *District Elements* and the *Monumental Core Framework Plan* that promote sustainability, economic development, and vibrancy of the Pennsylvania Avenue Corridor. The introduction of a curb cut would result in minor adverse impacts the *District Elements*.

GSA's proposed action and undertaking includes constructing a driveway in the L'Enfant Plan's historic 11<sup>th</sup> Street right-of-way, and reestablishing the intersection of Pennsylvania Avenue and 11<sup>th</sup> Streets, NW.

The proposed action is not inconsistent with the Pennsylvania Avenue Plan and General Guidelines at 36 CFR Part 910. In particular, the Pennsylvania Avenue Plan's General Guidelines and Square Guidelines prohibit mid-block curb cuts in development parcels on the north side of Pennsylvania Avenue, in order to prevent the loading docks or parking garages to which such driveways lead.

The sidewalk area being transferred by NPS to GSA, with its pavers and the Benjamin Franklin statue, was designed by PADC as part of the PADC Pennsylvania Avenue Plan and related requirements. While the regulations implementing the plan at 36 CFR 910.17(c) prohibit new curb-cuts along the north sidewalks, there is no similar proscription for the south sidewalk in front of OPO.

In addition, the General Guidelines at 36 CFR Part 910 support and reinforce an attractive, formal, and safe pedestrian setting and experience along Pennsylvania Avenue, the “major pedestrian thoroughfare of the Development Area.” The proposed driveway would reestablish the physical configuration of the L’Enfant Plan street by providing the former fourth leg of what is currently a three-way intersection.

The proposed action would return the south Pennsylvania Avenue sidewalk to the rhythm of what was previously two distinct blocks of Pennsylvania Avenue. The proposed driveway would not be an incompatible or anomalous mid-block intrusion across the sidewalk. By being located in the closed, historic L’Enfant Plan 11<sup>th</sup> Street at an existing intersection, the proposed driveway would offer clear visual cues that would be easily understood by pedestrians walking along the Avenue.

Overall, the Action Alternative would result in beneficial impacts on local plans and policies.

#### No Action Alternative

The No Action Alternative would not alter the existing building, uses, or public realm of the OPO. The sidewalk areas would not be transferred to GSA. NPS would continue to manage and administer the area pursuant to the PADC Pennsylvania Avenue Plan requirements and NPS’ own legal authorities since this area is part of the NPS’

Pennsylvania Avenue NHS. In addition, the No Action Alternative would not fulfill the policies and goals of the *Federal* and *District Elements*, the *Monumental Core Framework Plan*, and other planning documents. As a result, there would be negligible impacts on planning policies.

#### **3.2.6 What Measures Would be Taken to Improve Compliance with Applicable Plans and Policies?**

The preferred selected developer would coordinate, as required, with DDOT’s Urban Forestry Administration regarding the removal of trees on the site that exceed 55 inches or more in circumference.

Any changes to the area covered by the PADC Pennsylvania Avenue Plan and requirements will be considered through the process in the 1996 NCPC, GSA, NPS MOA to determine whether the Plan needs to be amended.

### 3.3 PUBLIC SPACE

#### 3.3.1 What is Public Space and What Plans and Policies Guide its Use and Design?

##### The District of Columbia Department of Transportation, Public Space Management

The District Department of Transportation (DDOT) has management and oversight responsibility for the use and occupancy of the public space that is not under the administration of a federal agency. According to DDOT, public space is defined as all the publicly owned property between the property lines on a street and includes, but is not limited to, the roadway, tree spaces, sidewalks, and alleys. At the Old Post Office, the sidewalks and areas between the walks and the curb line on Pennsylvania Avenue, 12<sup>th</sup> Street, and C Street are considered to be public space, as they are beyond the building's property line. Public space along Pennsylvania Avenue is unique in that the NPS has jurisdiction over space located between the face of the building and the curb line and is therefore not under the jurisdiction of DDOT.

*DCMR Title 24: Public Space and Safety* sets forth the regulations on public space, including provisions to maintain open space, greenery, and parks in public space.

*DCMR Title 24: Public Space and Safety* broadly defines the authority of the Public Space Committee to review and

recommend to DDOT approval or denial of a public space application for a use that goes beyond what is allowed by existing regulations and identifies specific public space applications that must go before the Committee. The Committee is responsible for considering and making final determinations on applications for various temporary and permanent uses of public space and areas within building restriction lines.

##### *District of Columbia Public Realm Design Handbook*

The *District of Columbia Public Realm Handbook* was created to document policies, procedures, and guidelines on how to properly approach public space. In the handbook, the public realm refers to key elements in the city's public right-of-way, including roadways, sidewalks, planting areas, intersections, alleys, plazas, and other open spaces that comprise the arteries and focal points of the urban framework. The handbook seeks to document how the public realm should look in terms of materials, visual quality, and landscaping, and to define some standard guidance for enhancing the public realm within the city. Specific topics addressed within the handbook include pavement options, landscaping and street trees, site amenities, lighting, low impact development, plazas and open space, public art, and coordination.

GSA: Achieving Great Federal Public Spaces

Although not directly related to DDOT's public space policy and review, GSA has published guidelines titled *Achieving Great Federal Public Spaces: A Property Manager's Guide*. This publication was released in 2007 as part of GSA's efforts to evaluate and improve public spaces and transform federal spaces into civic places. According to this guide, GSA buildings and public spaces should:

- Reflect the dignity and accessibility of government;
- Be secure and welcoming;
- Improve tenant satisfaction and building revenue;
- Provide a forum for tenant activity and public use;
- and
- Act as a catalyst for downtown revitalization.

The guide presents an overall strategy for improvement of a facility's public spaces, from physical enhancements to partnerships with communities, to better management practices. It recognizes a key challenge to be the need to increase security at federal facilities while providing welcoming public spaces.

Currently, the public entrances to the OPO require security screening of visitors. The 12<sup>th</sup> Street entrance is limited to government employees and authorized personnel, while the 11<sup>th</sup> Street plaza provides entry and exit access. The main 11<sup>th</sup> Street Entrance is closed, while a secondary

entrance into the basement is open to the public and provides both for entry and exit.

### 3.3.2 What are the Existing Public Space Conditions?

The OPO Building is essentially surrounded by public space, although the public space along Pennsylvania Avenue is under the jurisdiction of NPS. To the north of the building, NPS administers the public space along Pennsylvania Avenue (Figure 3-1). The Pennsylvania Avenue sidewalk extends from the walks to the street curb, approximately 25 feet and includes a plaza designed and created by PADC as part of the Pennsylvania Avenue Plan. This plaza features a statue of Benjamin Franklin placed there by PADC and the design and features of this area are protected by the PADC Plan and related requirements. Street trees, pedestrian street lights, and a series of planters are located in the NPS public space along Pennsylvania Avenue. Along 12<sup>th</sup> Street, the ten-foot-wide sidewalk contains limited amenities and has few street trees. South of the building, the C Street plaza area, which is approximately 80 feet in width including the service driveway, contains landscape trees, public seating, and access to the site.

### 3.3.3 How Would Public Space be Affected by the Proposed Improvements?

#### Action Alternative

The rehabilitation of the OPO would include changes along C Street. The hotel's café would also offer moveable, non-fixed outdoor seating in the C Street plaza within public

space. The placement of tables and chairs would adjust seasonally, including their removal during the colder winter months. These changes would reduce the space available in the expanded sidewalk area and plaza, minimally constricting pedestrian activities. The outdoor seating would also serve to enliven and activate the spaces, providing a more inviting and engaging pedestrian environment. GSA is in the process of completing the closure of C Street, which was initiated in 1986.

The rehabilitation of the OPO Building would remove the existing single story glass and steel structure that serves as the entrance from the C Street plaza. Because this existing feature extends into the C Street right of way, its removal would help return the space to its earlier condition. The existing low walls south of the building that help define the service entrance are also located within the C Street right of way; the walls would remain.

Public access to the OPO would be facilitated through the alterations to existing entrances. Security screening facilities would be removed, reducing the need for visitors to queue at entrances. The 12<sup>th</sup> Street entrance would be opened for access by the general public. Along the southern entrance, the rehabilitation of the OPO would remove the existing glass and steel structure enclosing an accessible ramp with switchbacks. The C Street plaza area would be redesigned to step down to the C Street entrance and would also include a handicap accessible ramp for the C Street



entrance, providing a more direct entrance for visitors and more direct access for the public to the Clock Tower. These changes would be consistent with GSA's *Achieving Great Federal Public Spaces*.

New landscaping would be included in the design of the C Street plaza.

Minimal changes are anticipated to sidewalks along Pennsylvania Avenue and 12<sup>th</sup> Street, including necessary repairs, the removal of street trees, and the 11<sup>th</sup> Street driveway, which would require a pedestrian crosswalk. The numerous perimeter security planters located in the sidewalk along Pennsylvania Avenue in front of the OPO would also be removed, which would improve public space, including pedestrian circulation as described in Section 3.11.6; those planters located in front of the IRS Building would remain, although repositioned. Sidewalk cafes are proposed at the Pennsylvania Avenue side of the building in the area proposed for transfer by NPS to GSA. The cafes would feature moveable seating and furniture. Sidewalk café would serve to enliven the public space along Pennsylvania Avenue. The Benjamin Franklin statue would remain in its current location and the Artwork Pavers would remain, as these are protected as part of the PADC Pennsylvania Plan.

Overall, there would be minor adverse impacts due to potential restriction of pedestrian movements at the 11<sup>th</sup> Street driveway and the conversion of the pedestrian plaza

that currently exists between the IRS building and the OPO to a vehicular drive. Beneficial impacts would result from the activation of the C Street Plaza and Pennsylvania Avenue, the removal of perimeter security planters in front of the OPO along the Pennsylvania Avenue sidewalk, and the removal of the glass and steel structure in the C Street Plaza.

#### No Action Alternative

The No Action Alternative would not alter the existing public realm of the OPO. The 11<sup>th</sup> Street corridor would maintain the existing pedestrian area east of the OPO. The glass and steel structure that provides ramp access to the building would remain in the C Street right-of-way, as would the walls near the service entrance. The existing perimeter security planters located along the Pennsylvania Avenue sidewalk north of the OPO would also remain. The NPS would not transfer jurisdiction to GSA for the sidewalk and plaza area along Pennsylvania Avenue and NPS would continue to administer the area pursuant to the PADC's Pennsylvania Plan and related requirements and the NPS' authorities. As a result, there would be negligible impacts on public space.

### **3.3.4 What Measures Would be Undertaken to Reduce Impacts to Public Space?**

The preferred selected developer would coordinate with DDOT throughout the design process to ensure compliance with their *Design and Engineering Manual* and *Public Realm Design Handbook*. The preferred selected developer would be responsible for obtaining public space permits for activities conducted in public space under DDOT jurisdiction.

GSA is in the process of completing the closure of C Street, which was initiated in 1986. However, pending formal closure of C Street, the preferred selected developer would be required to obtain a public space permit for activities in C Street under DDOT's jurisdiction.

The preferred selected developer, along with GSA, would coordinate with appropriate law enforcement agencies to determine necessary security measures for the Clock Tower.

GSA, along with the preferred selected developer, would consult with NPS regarding any proposed future changes to the Pennsylvania Avenue streetscape and sidewalks to ensure consistency with the NPS' overall planning and desired objective of the Pennsylvania Avenue corridor.

### 3.4 SOCIOECONOMICS

#### 3.4.1 How are Socioeconomics Analyzed?

Socioeconomics in this EA are based on the fiscal and employment conditions of the District of Columbia and the national capital region. Fiscal conditions include both sales and hotel tax revenue. In order to calculate a baseline amount for sales tax revenue and employment, the following assumptions were used:

- Retail space (including restaurants) typically generates approximately \$47 per sf in sales tax. The District of Columbia received \$968 million from 20.5 million sf of retail spaces, which results in an average of \$47 per sf (District of Columbia 2011 and CoStar 2011).
- Retail space (including restaurants) employs approximately one person (or full-time equivalent) for every 450 sf space. This estimate is based upon the industry averages and the professional experience of economic analysts.

When evaluating socioeconomic impacts, this EA uses a range of calculations. Sales tax revenue and employment estimates are based on the assumptions described above. The preferred selected developer has also provided calculations using its own methodology. Furthermore, it is

estimated that the value of goods and services sold in the new retail space would be greater than the current stores.

The socioeconomic impact analysis also includes hotel tax revenue. The preferred selected developer uses a 72 percent occupancy rate and estimates an average daily rate of \$660.

The preferred selected developer provided estimated direct and indirect employment numbers based on its experience and economic analysis.

#### 3.4.2 What are the Socioeconomics Associated with the Site?

GSA currently leases space in the OPO to retail establishments (including restaurants) and federal office tenants. Of the total 261,204 leasable sf of office and retail space in the OPO Building, retail space accounts for approximately 48,604 sf, while the office space accounts for approximately 212,600 sf. The Annex offers an additional 50,277 sf of retail space, although it is currently vacant and used by some retail tenants as storage space.

The retail sales in the OPO provide the District of Columbia sales and use tax revenue. The current sales tax rate is 6 percent on general merchandise and 10 percent on restaurant sales. Given the current occupancy rate of 38 percent (18,883 sf) and using an average of \$47 in sales tax revenue per sf, it is estimated that the OPO Building

generates approximately \$890,000 in sales and use tax. At this time, no businesses currently operate in the Annex, and therefore the occupancy rate is zero.

The retail stores, restaurants, and offices provide employment opportunities for area residents. The total workforce of the Washington, DC area is an estimated 3.2 million, including an estimated 344,300 living in the District of Columbia (Census Bureau 2012). Those currently employed at the OPO include those working in restaurant and retail establishments, as well as federal employees working at agencies housed in the OPO. Using a ratio of approximately one person for every 450 sf of restaurant and retail space, it is estimated that approximately 42 full time equivalents are employed at the existing retail and restaurant establishments.

### **3.4.3 How Would Socioeconomics Be Affected by the Proposed Improvements?**

#### Action Alternative

The Action Alternative would replace the existing retail and office space within the OPO with 267 guest rooms and suites, along with retail space encompassing retail, restaurants, a spa, and a museum. There would be approximately 6,100 sf of retail space, including the spa, and 27,200 sf of restaurant space. It is anticipated that the existing retail and restaurant businesses and the federal

agencies would relocate to other locations within the District of Columbia.

The new retail and restaurant businesses within the OPO would provide sales tax revenue to the District of Columbia. Using an average of \$47 sales tax generated per square foot of retail in the District of Columbia, it is estimated that the 33,300 sf of retail space from the giftshop, spa, other designated retail space, bar, and restaurants would generate approximately \$1.51 million in net new sales tax revenue. The businesses that currently operate in the OPO would relocate, and therefore continue to provide sales tax revenue similar to current conditions.

The District of Columbia also levies a hotel tax of 14.5%. Using the preferred selected developer's projection of an average daily rate of \$660 and 72 percent occupancy at stabilization, the 267 rooms and suites of the proposed luxury hotel would generate approximately \$6.5 million in hotel tax revenue in 2018.

The proposed rehabilitation of the OPO would provide employment in the retail, restaurant, and hotel sector; this is in addition to the employees that would continue working at the retail stores, restaurants, and offices that would be relocated from the OPO. It is estimated that the OPO renovation would create 500 permanent net new direct jobs and another 240 indirect jobs for the Washington, DC community.

Short-term minor adverse socioeconomic impacts could occur as a result of the disruption as businesses transition between locations. Overall, the Action Alternative would have a long-term beneficial impact on economic and fiscal resources.

#### No Action Alternative

The No Action Alternative would not alter the existing socioeconomic conditions associated with the OPO. The existing businesses and government agencies would continue operations at the site. As a result, there would be negligible impacts on socioeconomics.

#### **3.4.4 What Measures Would be Undertaken to Reduce Impacts to Socioeconomics?**

GSA would facilitate the relocation of federal agency tenants of the OPO to other locations within Washington, DC.

### **3.5 CULTURAL RESOURCES**

#### **3.5.1 How are Impacts to Cultural Resources Evaluated?**

Potential impacts to historic resources must be considered as part of an EA, per the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 CFR 1502). Potential impacts include direct and indirect impacts over the short- and long-term. The alteration, physical displacement, or demolition of a resource is a direct impact; impacts from changes in the use, operation, or character of a resource can be either direct or indirect; and changes to the visual context are considered indirect impacts.

The National Historic Preservation Act of 1966, as amended (NHPA), establishes standards for evaluating potential effects to historic resources. The NHPA defines “effect” as “an alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register” (36 CFR 800.16). It requires that the lead agency, in consultation with the SHPO, determine whether the effect is adverse. NHPA defines the occurrence of an adverse effect as “when an undertaking may alter, directly or indirectly, any of the characteristics of the historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” (36 CFR

800.5). For the purposes of this document, a finding of beneficial impact or negligible or minor adverse impact would result in a finding of “no adverse effect” under the NHPA; a moderate or major impact would result in a finding of “adverse effect” under NHPA.

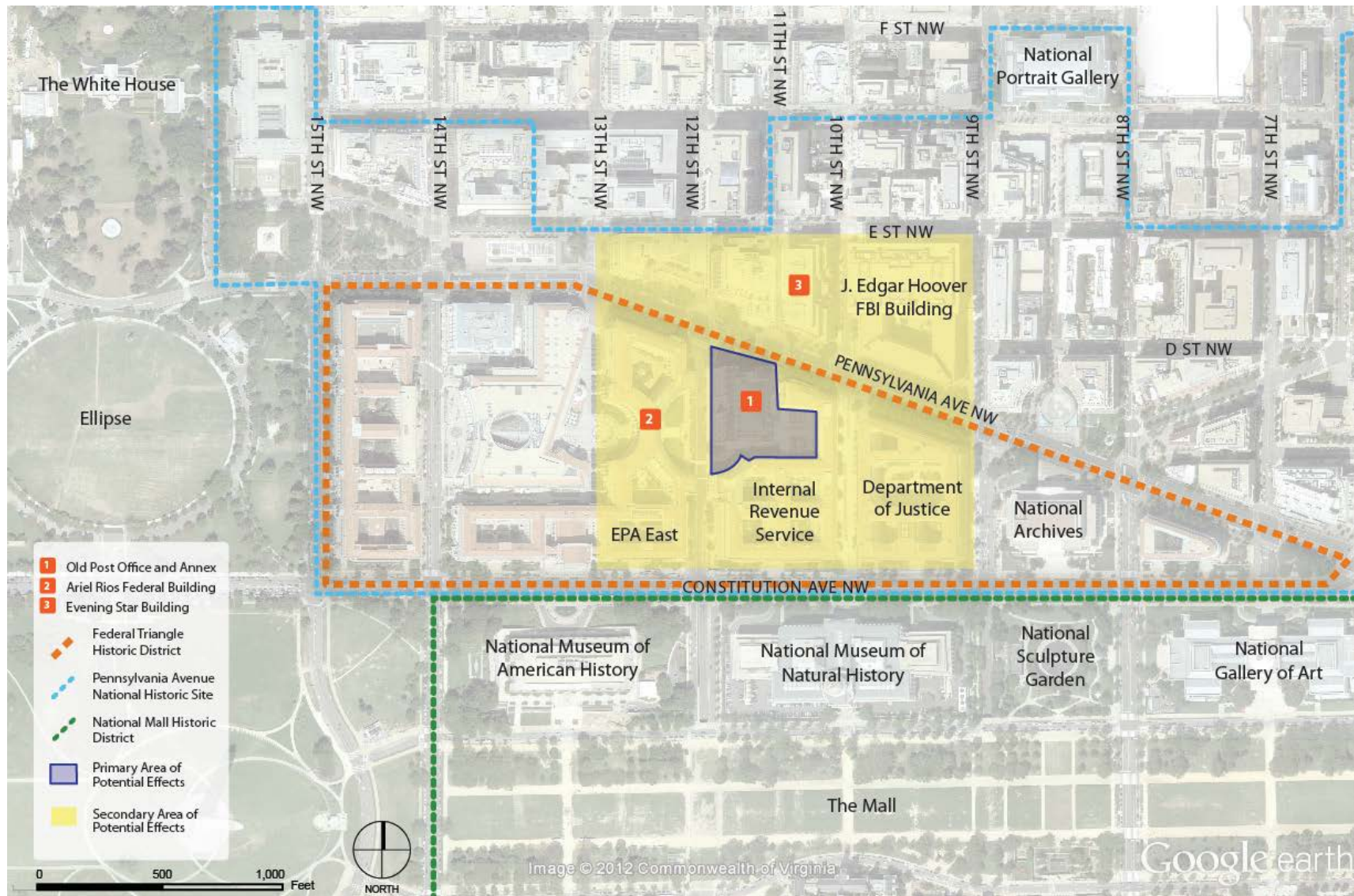
In accordance with the Advisory Council on Historic Preservation (ACHP) regulations at 36 CFR Part 800 implementing Section 106, effects on cultural resources are identified and evaluated by (1) determining the area of potential effects (APE), (2) identifying cultural resources present in the area of potential effects that are either listed in, or eligible to be listed in, the National Register of Historic Places, (3) applying the criteria of adverse effect to affected resources, and (4) considering ways to avoid, minimize, or mitigate adverse effects. As recommended by CEQ and the Code of Federal Regulations Title 36 “Protection of Historic Properties”, the Section 106 process is being undertaken concurrent with the environmental review process mandated by NEPA (36 CFR 800.8). GSA is the lead agency for some of the federal agencies in the Section 106 process. The NPS is fulfilling its Section 106 responsibilities through this same process.

#### **3.5.2 What is the Area of Potential Effects?**

The Area of Potential Effects (APE) is the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic

properties, if any such properties exist. Through the Section 106 process, the APE for historic resources was defined based on the potential for exterior improvements to be visible from historic properties surrounding the site. The Primary APE includes the OPO site bounded by the exterior curb line along 12<sup>th</sup> Street and Pennsylvania Avenue and

the façade of the IRS Building along 11<sup>th</sup> Street, the Annex Courtyard, and C Street. The Secondary APE is bounded by 13<sup>th</sup> Street on the west, E Street on the north, 9<sup>th</sup> Street on the east, and Constitution Avenue on the south. The Primary and Secondary APEs are illustrated in Figure 3-3.



**Figure 3-3: Area of Potential Effects**

Source: AECOM 2012



### 3.5.3 What Historic Properties Lie within the APE?

#### Old Post Office

The Old Post Office and Clock Tower is one of Washington's few Romanesque Revival buildings on a monumental scale. It was also the first Federal building erected on Pennsylvania Avenue in the area that became known as the Federal Triangle. Design of the nine-story rectangular structure began in 1891 and construction was completed in 1899. Willoughby J. Edbrooke oversaw the building's design as the Supervising Architect of the Treasury between 1891 and 1893. Four subsequent Supervising Architects of the Treasury contributed to the building before its completion in 1899.

The OPO Building encompasses the entire block between Pennsylvania Avenue and 11<sup>th</sup>, 12<sup>th</sup>, and C Streets, and features masonry walls faced with Vinalhaven, Maine granite. The masonry, massing, and detailing of the building are typical of the Romanesque Revival style, while the dormered roof is in the French Gothic style. Arcades featuring massive Romanesque arches are found along the northern, eastern, and western elevations. At the corners of the building, circular turrets rise from the foundation to the roof. The Romanesque Revival motifs are reminiscent of the Allegheny Courthouse in Pittsburgh, Pennsylvania, designed by H.H. Richardson. The south elevation features a loading dock. The central element of the design was the

Clock Tower, which extends five stories above the central mass of the building to 315 feet above grade, making it among the tallest structures in Washington.

According to the Old Post Office Historic Structure Report, prepared in 2013, the building also incorporated technical innovations that set it apart at the time of construction including "its skeletal steel structure (the masonry tower supported its own weight, while the exterior stone walls essentially acted as curtain walls) and its fireproof construction."

The interior of the building is largely defined by its center atrium, called the cortile. This expansive first-floor area is lit from above by a skylight roof. Encircling the cortile on all floors above it is a single-loaded corridor that provides access to offices, storage, and circulation. At the time of construction, it was one of the largest enclosed central courts in the world.

The building was created to function as the headquarters for the United States Postmaster General, the Post Office Department, and the City Post Office. It served as the City Post Office as well as the headquarters of every Postmaster General from 1899 to 1934. In 1914, the City Post Office moved to a new building adjacent to Union Station. The Post Office Department remained in its headquarters until 1934.

The Old Post Office is listed in the National Register of Historic Places due to its architectural and historical significance. It is considered significant for its status as a singular architectural landmark due to its Romanesque design and towering silhouette, and its association with historical events including the establishment of Flag Day as a national holiday. It is also listed in the DC Inventory of Historic Places and is a contributing building to the Pennsylvania Avenue National Historic Site and the Federal Triangle Historic District.



**Figure 3-4: Old Post Office Southwestern Corner, from 12<sup>th</sup> Street**

*Source: WDG Architecture*



**Figure 3-5: Old Post Office north Elevation, from Pennsylvania Avenue**

*Source: WDG Architecture*

### L'Enfant and McMillan Plans

Pierre Charles L'Enfant's 1791 Plan for the City of Washington is one of the country's most notable achievements in urban planning. The Baroque plan is characterized by a coordinated system of radiating avenues, associated vistas, and parks overlaid on an orthogonal grid of streets. The future sites of the White House and the Capitol Building are focal points within the plan and the Mall is envisioned as a greensward running through the center of the city. Through its arrangement of rights-of-way, views, parks, and buildings, the plan delineates the physical and symbolic character of the capital city.

The Senate Park Commission of 1901, also known as the McMillan Commission, expanded on the L'Enfant Plan at the turn of the century resulting in a plan that was a true manifestation of the City Beautiful movement. The McMillan Plan extended the Mall to the west and terminated several visual axes with monuments. The principles articulated within the L'Enfant and McMillan plans continue to guide development in Washington.

The L'Enfant Plan is listed in the National Register of Historic Places and a draft National Historic Landmarks nomination has been completed for the Plan. It is also listed in the DC Inventory of Historic Sites. The nominations recognize components of the McMillan Plan that contribute to, extend, or enhance the L'Enfant Plan.



**Figure 3-6: L'Enfant Plan for the City of Washington, 1792**

*Source: Library of Congress, Geography and Maps Division*

The National Register Nomination identifies the rights-of-ways and vistas that border the project site on the north and west as contributing elements to the historic plan. Pennsylvania Avenue in front of the OPO Building is known as "America's Main Street." It physically and visually connects the White House and its grounds to the Capitol Building, it serves as a ceremonial route to the Capitol, and it forms the northern edge of the Federal Triangle. The avenue and its vista are identified as contributing elements

to the plan. Twelfth Street borders the site to the west and is considered a contributing street. Several original L'Enfant reservations are also located near the site: Original Appropriation number 2, the National Mall, lies to the south of the Old Post Office and Reservations 32 and 33, Freedom Plaza, lie to the northwest of the Old Post Office.

#### Pennsylvania Avenue National Historic Site

The Pennsylvania Avenue National Historic Site, which has been administered by NPS since 1996 as a part of the National Mall and Memorial Park of the National Park System, is roughly bounded by Constitution Avenue to the south, F Street to the north, 3rd Street to the east and 15<sup>th</sup> Street to the west, in northwest Washington, DC. It encompasses Pennsylvania Avenue between the White House and the Capitol Building. Pennsylvania Avenue has functioned as the main ceremonial route for government ceremonies since the early 19<sup>th</sup> century. It is the symbolic link between the legislative and executive branches of the Federal government of the United States. The avenue was historically the city's commercial core. The area is listed in the National Register of Historic Places as a National Historic Site. It is also listed in the DC Inventory of Historic Sites. The National Register nomination identifies over 100 contributing features, including buildings, memorials, parks, and statues.

Within the APE, contributing elements include the Statue of Brigadier General Count Casimir Pulaski in Freedom Plaza

and the Benjamin Franklin Statue in front of the Old Post Office although this was not its original site. It was relocated there by the PADC as part of its design for the plaza in front of OPO, and the statue is protected under the PADC Pennsylvania Avenue Plan and related requirements. The Benjamin Franklin Statue is also listed on the DC Inventory of Historic Sites. Vistas planned by the L'Enfant and McMillan plans are incorporated within the Pennsylvania Avenue Historic Site, including the broad vista along Pennsylvania Avenue and the view south on 10<sup>th</sup> Street. Contributing Buildings include the Evening Star Building (discussed below) and federal government buildings that are also within the Federal Triangle: the three-part building facing Constitution Avenue that includes the EPA East Building, the Ariel Rios Federal Building (also known as the United States Post Office Building) the Old Post Office, the Internal Revenue Service Building, and the Robert F. Kennedy Department of Justice Building.

The streetscape features along Pennsylvania Avenue adjacent to the Old Post Office were developed as part of the PADC Pennsylvania Avenue Plan and they are part of the Pennsylvania Avenue National Historical Site administered by the NPS. Except for areas with unique paving patterns, such as the Artwork Pavers in front of the Old Post Office, the sidewalks consist of square, brown brick pavers edged with granite curbing, installed by PADC.



### Federal Triangle Historic District

The Federal Triangle Historic District is a 75-acre, three-sided site bounded by Constitution Avenue on the south, Pennsylvania Avenue on the north, and 14<sup>th</sup> Street on the west. It was conceived by the Supervisory Architect to the Secretary of the Treasury in 1896 and became a key component of the McMillan Plan, which set out the style of architectural and materials to be used for these buildings. A detailed plan for the area was developed after the passage of the Public Buildings Act in 1926 and construction began shortly thereafter. Except for the Old Post Office and the District Building, the buildings in the Neo-Classical complex were constructed under this plan. The goal of the project was to provide government agencies with buildings that would meet their specific needs, while also maintaining a consistent aesthetic expression of the authority of the federal government. The Triangle buildings are characterized by limestone facades, red tile roofs, classically inspired colonnades, and pedimented porticoes. Buildings within the APE that contribute to the district are discussed above under the Pennsylvania National Historic Site. The Federal Triangle Historic District is listed in the National Register of Historic Places and is located within the boundaries of the Pennsylvania Avenue National Historic Site. It is also listed in the DC Inventory of Historic Sites.

### Ariel Rios Federal Building

The Ariel Rios Federal Building (Figure 3-7) is located across 12<sup>th</sup> Street from the Old Post Office. The building was designed by Delano and Aldrich in 1934 and was originally known as the New Post Office Building as it housed the Post Office Department until 1971. The building was part of the redevelopment of the Federal Triangle and is in the neoclassical styling of the other buildings located within the Federal Triangle. It is semicircular in design and has a Doric colonnade on the building's west elevation. The building contributes to the Federal Triangle Historic District and the Pennsylvania Avenue National Historic Site.



**Figure 3-7: Ariel Rios Building**

*Source: AECOM 2012*

### Evening Star Building

The Evening Star Building (Figure 3-8) is located to the north across the street from the OPO at 11<sup>th</sup> Street and Pennsylvania Avenue. It was designed in 1898 by Walter Gibson Peter of Marsh and Peter and construction was completed in 1900. It is an early example of steel frame commercial construction. Its structural system is faced with a typical Beaux Arts cladding of Vermont marble. It served as offices and the printing plant for the *Evening Star* newspaper until 1959. The building underwent extensive renovations and restoration in 1988-89. It is listed in the DC Inventory of Historic Sites and is a contributing building to the Pennsylvania National Historic Site.



**Figure 3-8: Evening Star Building (on the right)**

*Source: AECOM 2012*

### **3.5.4 How Would Historic Resources be Affected by the Redevelopment?**

#### Action Alternative

The redevelopment of the OPO would preserve the exterior masonry and mortar (including the walls, turrets, tower, stairs, trip, door and window surrounds, trim, craft details, and area-ways) as well as the projections (including dormers, towers, and turrets). The restoration of the building's structure and exterior would be in a manner consistent with the Secretary of the Interior's standards. The redevelopment would rehabilitate the building's metalwork as required based on their condition (area-way railings, window grills, loading dock truss, skylight, flashing, copper detailing), the windows (wood double-hung, casement, fixed, leaded glass skylight), glazing (windows, skylight), and roofing (slate, copper, built-up). On the interior, the Cortile's multi-story open space characterized by the original metal trusses would be rebuilt more closely to its original design by reinstating the first floor. These preservation and rehabilitation efforts and the removal of a structure on the south side of the OPO blocking the original façade would result in beneficial impacts to the historic structure.

Several windows would be installed along the 11<sup>th</sup> Street side of the central and southern portions of the OPO Building roof as well as on the south side of the OPO

Building roof, flush with the existing roof. These windows would comprise an introduction of a new feature to the historic structure based on historic documentation of windows once located on the south side of the OPO Building roof and would have a minor adverse impact on the structure due to removal of a small portion of the historic fabric of the building. There would be no adverse effect under Section 106.

The Pennsylvania Avenue entrance would be utilized as a primary pedestrian point of entry for the hotel. Canopies to provide overhead protection from the elements to identify the 11<sup>th</sup> Street entrance could be installed, depending on the evolution of the detailed design and the Section 106 process. The canopies at the entrances to the hotel would not be attached to the historic fabric of the building and would be designed as a reversible change to the historic structure.

The preservation, rehabilitation, and alterations to the OPO undertaken during renovations would be accomplished in accordance with the Secretary of Interior's Standards for Historic Properties and the Secretary of Interior's Standards for Rehabilitation. Therefore, direct impacts to the historic structure would be minor and no adverse effect would occur to the OPO Building under Section 106 of the NHPA.

The installation of public landscaped gathering spaces and moveable, non-fixed restaurant seating on the north side of

the building, including tables, chairs, planters, and umbrellas, would maintain the OPO's paved apron and the Benjamin Franklin statue along Pennsylvania Avenue that are part of the design of the PADC Pennsylvania Avenue and will be transferred from NPS to GSA before any changes are made. This area is currently part of the Pennsylvania Avenue National Historic Site, which is under NPS jurisdiction. The Benjamin Franklin statue is a contributing element of the Pennsylvania Avenue National Historic Site although this is not the statue's original and historic location. As part of the transfer of jurisdiction from NPS and GSA, GSA would assume responsibility for the Benjamin Franklin statue. A curb cut would be added to the south side of Pennsylvania Avenue at the 11<sup>th</sup> Street intersection to provide an entry driveway after jurisdiction for the area is transferred from NPS to GSA. Low landscape plantings and signage would be installed along the driveway. These additions and alterations would maintain the broad vistas along Pennsylvania Avenue. The 11<sup>th</sup> and 12<sup>th</sup> Street vistas would be minimally changed and their overall character would be maintained. Indirect impacts to the L'Enfant and McMillan Plans, the Pennsylvania Avenue Historic Site, and the Federal Triangle Historic District would be negligible and no adverse effect would occur under Section 106.

The canopies that could be installed at the entrances to the hotel would add a modern element adjacent to the historic structure and would be visible from the Evening Star

Building. However, they would be in keeping with other commercial features such as sidewalk cafes, signs, and canopies along Pennsylvania Avenue. They would also be consistent with the existing use of the plaza on C Street. There would be an indirect beneficial impact to the Ariel Rios Building due to the removal of the existing glass and steel structure within the C Street Plaza and restoration of the view of the OPO's historic façade, although this would also make the OPO loading area more visible.

The addition of windows in the roof on 11<sup>th</sup> and C Streets would have indirect minor adverse impacts to views of the OPO Building from the Ariel Rios Building, the Evening Star Building, the Pennsylvania Avenue National Historic Site, and the Federal Triangle Historic District as a new element visible from some vantage points during the day and when illuminated from within during the evening, as discussed in the Visual Resources section. There could be short-term impacts to historic structures and districts during construction due to the visual impact of construction equipment and materials staging. Overall, long-term impacts would be minor and no adverse effect would occur under Section 106, including to the Pennsylvania Avenue National Historic Site. Long-term beneficial impacts due to the preservation and rehabilitation of the OPO would also occur.



No Action Alternative

Under the no action alternative, the redevelopment of the OPO would not occur and no changes would be made to historic resources. The building would be maintained under current operations and maintenance standards. The sidewalk area along Pennsylvania Avenue would remain under the jurisdiction of NPS as part of the Pennsylvania Avenue NHS. Overall, long-term impacts would be negligible.

**3.5.5 What Measures Would be Undertaken to Reduce Impacts to Historic Resources?**

Pursuant to Section 106 of the National Historic Preservation Act (NHPA), Federal agencies are required to consider the effects of any undertakings on districts, sites, buildings, structures, or objects included, or eligible for inclusion, in the NHRP. Federal agencies are also required to afford the Advisory Council on Historic Preservation (ACHP) a "reasonable opportunity to comment with regard to such undertaking."

Pursuant to 36 CFR Part 800, regulations implementing Section 106 of the NHPA (16 U.S.C. Section 470(f)), GSA has consulted with the DC SHPO, ACHP, other Signatory Parties, and Consulting Parties regarding the effects of the Undertaking and in the development of the Programmatic Agreement (PA) for the leasing, rehabilitation, ongoing maintenance and stewardship of the Old Post Office Building and Annex, and associated transportation improvements. The NPS has also participated in this process in compliance with its responsibilities under Section 106. Based upon the 35 percent design of the project, GSA, with the concurrence of the DC SHPO and the PA signatories, has determined the project will have no adverse effects on the Old Post Office Building or other historic properties. GSA, along with the preferred selected developer, shall ensure that the measures outlined in the

PA are carried out to avoid adverse effects. The PA has been included in the Final EA as Appendix 4.9.

### **3.5.6 What is the Potential for Archaeological Resources at the Site?**

No archaeological surveys have been completed on the OPO Building site. Property maps from 1888, four years before the start of construction, indicate that the site was occupied by commercial businesses and residences, similar to neighboring blocks at that time. By 1892, the site had been cleared of existing buildings and had been excavated in order to lay the foundation for the building. The OPO Building footprint conforms to the established building line, including the established building setback requirements for C Street. During construction of the OPO, excavation likely extended several feet beyond the existing building footprint. The IRS Building, located on the south side of C Street, was completed in 1930. It is unclear if the C Street right of way was disturbed during the construction of either the OPO or IRS Buildings. Thus, it is possible that archaeological resources are present on the OPO Building site at the C Street plaza.

### **3.5.7 How Could Archaeological Resources be Affected by the Site Improvements?**

#### Action Alternative

The re-grading of the C Street plaza to gently slope toward the ground floor entrance of the OPO Building would require excavation of the existing plaza to a depth of approximately 3.5 feet or less. The deepest excavation would be required closest to the OPO Building, where the chances of previous disturbance would likely be greater, due to original excavation required by the construction of the building. It is possible that resources pre-dating the OPO Building could be disturbed during the grading.

Due to the proposed removal of the paved surface in the pedestrian plaza and the installation of a driveway near the Annex, east of the OPO Building, subsurface activity would also occur, although it is anticipated that the depth would not extend beyond that already disturbed by the installation of the existing plaza.

Due to the unknown nature of resources at the site, it is possible that the re-grading of the C Street plaza could disturb potential archaeological resources in the area between 12<sup>th</sup> Street and south of the OPO Building. In contrast, the replacement of the paved surface pedestrian area near the Annex would likely not result in disturbance of archaeological resources due to the limited depth of

construction, which would extend to areas previously disturbed. As a result, there is the potential for minor adverse impacts to archaeological resources.

#### No Action Alternative

Under the No Action Alternative, no sub-surface construction or excavation activity would occur. As a result, there would be no impacts to archaeological resources.

### **3.5.8 What Measures Would be Undertaken to Reduce Impacts to Archaeological Resources?**

GSA, along with the preferred selected developer would ensure that measures outlined in the Section 106 PA for the OPO be carried out in order to avoid, minimize, or mitigate adverse effects to archaeological resources. The PA has been included as Appendix 4.9.

### 3.6 VISUAL RESOURCES

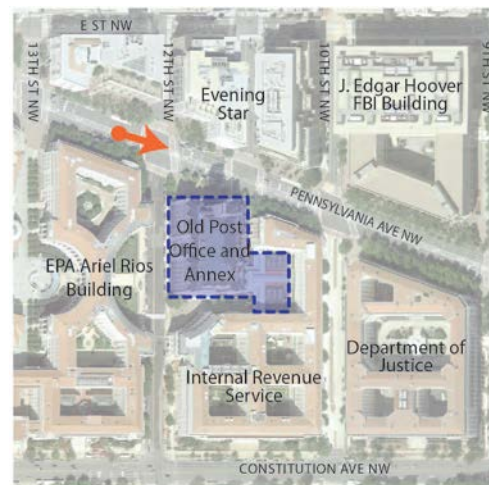
#### 3.6.1 What is the Visual Character of the Site and the Surrounding Area?

##### Pennsylvania Avenue (view looking southeast)

The Pennsylvania Avenue viewshed in the vicinity of the OPO encompasses Pennsylvania Avenue between the U.S. Capitol and Pershing Park, near the White House. The landscape features including the placement of trees, the pavers and street furniture were installed by PADC. The viewshed looking east features a tree-lined, eight-lane avenue in an urban environment occasionally broken by roadway intersections. The terminus of the viewshed is the U.S. Capitol, which is centered within the viewshed. The roadway is bordered by sidewalks, street trees, and mid-rise buildings, all of which, with the exception of the OPO, combine to provide a consistent visual line toward the U.S. Capitol. The Clock Tower of the OPO interrupts the buildings' roof line with a vertical tower several stories taller than the surrounding buildings. The street trees are mature, allowing filtered views of the lower stories and unobstructed views of the upper stories of buildings. Other elements within the periphery of the viewshed include sidewalk furniture, such as benches and street lights, building entrances and awnings, and perimeter security planters. Elements visible within the center of the viewshed include traffic signals, bike lanes, and street signs.



**Figure 3-9: View East along Pennsylvania Avenue**  
*Source: AECOM 2012*





**Figure 3-10: View West along Pennsylvania Avenue**

*Source: AECOM 2012*



Nighttime lighting along Pennsylvania Avenue focuses on the U.S. Capitol and the Treasury Building at each end of the view corridor. Between these two endpoints, nighttime lighting comes from street lights, sidewalk lighting in building areas, and from internally-lit window. The OPO clock in the Clock Tower is also lit internally. Due to the wide corridor and pedestrian lighting requirements, the view corridor appears relatively dark.

#### 12<sup>th</sup> Street (view north)

The 12<sup>th</sup> Street viewshed in the vicinity of the OPO encompasses 12<sup>th</sup> Street between downtown to the north and the National Mall and 12<sup>th</sup> Street tunnel to the south. The viewshed looking north is of an urban setting characterized by a six-lane roadway defined by mid-rise buildings that form a consistent roof line. Portions of the IRS Building and the Ariel Rios Building extend into the sidewalk, narrowing the view corridor as one approaches downtown from the Mall. Building plazas and roadway intersections cause intermittent breaks in the visual line. Street trees inconsistently line 12<sup>th</sup> Street along the sidewalk. Within the C Street plaza, visitor amenities are visible. Nighttime lighting comes from street lights, pedestrian lighting of building areas, and from internally-lit windows.





**Figure 3-11: View North along 12<sup>th</sup> Street**  
*Source: AECOM 2012*



**Figure 3-12: View South along 12<sup>th</sup> Street**  
*Source: AECOM 2012*



11<sup>th</sup> Street (view south)

The 11<sup>th</sup> Street viewshed in the vicinity of the OPO encompasses 11<sup>th</sup> Street between downtown to the north and the OPO and the IRS Building to the south. The viewshed of 11<sup>th</sup> Street looking south is of a six-lane roadway lined by sidewalks, occasional street trees, and mid-rise buildings that form a continuous line. The viewshed terminates at the OPO plaza area and the IRS building, with a layered view of street and landscape trees in the plaza and the buildings in the background. Nighttime lighting comes from street lights, pedestrian lighting of building areas, and from internally-lit windows.



**Figure 3-13: View South along 11<sup>th</sup> Street**

*Source: AECOM 2012*



### 3.6.2 How are Impacts to Visual Resources Assessed?

The visual impact assessment for the proposed OPO Building renovation addresses potential changes to views and vistas that can be attributed to the proposed action. Impacts to views and vistas are determined based on an analysis of the existing quality of the view, the sensitivity of the view (such as important views from historic and cultural sites), and the anticipated relationship of the proposed design elements to the existing visual environment.

Visual impacts in the analysis presented below are described using the following thresholds:

- **Negligible impact-** The proposed alternations would not result in any visual changes, or the changes would not be noticeable.
- **Minor impact-** The proposed alterations would be visible, but would not interfere with views and would not change the character of the existing views.
- **Moderate impact-** The proposed alterations would be visible and would interfere with existing views, but would not change the character of the existing views.
- **Major impact-** The proposed alterations would be visible as a contrasting or dominant element that

interferes with views and substantially changes the character of the existing views.

- **Beneficial impact-** The proposed alterations would improve a view or the visual appearance of an area.

### 3.6.3 How Would Key Viewsheds be Affected by the Project?

#### Action Alternative

##### *Views along Pennsylvania Avenue*

The Action Alternative would introduce a curb cut on Pennsylvania Avenue that would be installed after NPS transfers the area to GSA, and a driveway that would allow hotel drop-offs on the eastern portion of the OPO. Low landscape plantings and signage would be installed along the driveway. Signage would be installed in the middle archway of the OPO Pennsylvania Avenue entrance. New awnings with hotel and/or retail signage would replace the existing first floor awnings of Pennsylvania Avenue and 12<sup>th</sup> Street. Also under the Action Alternative, the restaurant(s) of the OPO would install two outdoor dining areas along Pennsylvania Avenue. The outdoor dining areas would include moveable, non-fixed tables, chairs, planters, and umbrellas.

In addition, several windows would be installed flush to the existing roof along the 11<sup>th</sup> Street side of the central and southern portions of the OPO Building roof.



The Action Alternative would alter the Pennsylvania Avenue viewshed by introducing new elements along the periphery. The primary character of the viewshed would remain a broad tree-lined avenue in an urban area terminating at the U.S. Capitol to the east and Pershing Plaza to the west. The addition of a curb cut along Pennsylvania Avenue would accentuate the visual break at the intersection of 11<sup>th</sup> Street and Pennsylvania Avenue by removing street trees and interrupting the continuous sidewalk in the area. At the edge of the view corridor, views of the awnings and outdoor dining features would be filtered through street trees. During daytime and evening hours, the roof windows would not be visible and would not distract the viewer from primary focal points of the view corridor, the U.S. Capitol and the Treasury Building. Given the visual break of the intersection of Pennsylvania Avenue and 11<sup>th</sup> Street, the removal of street trees, and the low height of the signage and outdoor dining in contrast to the broad roadway and height of buildings and their location at the edge of the viewshed, the Action Alternative would result in minor impacts on views along Pennsylvania Avenue.

#### *Views along 12<sup>th</sup> Street*

Under the Action Alternative, the restaurants proposed in the redevelopment of the OPO would install outdoor dining areas in the C Street plaza adjacent to the OPO. The dining areas would include tables, chairs, planters, and umbrellas. The street tree at 12<sup>th</sup> Street and the C Street plaza would remain. Existing awnings above the windows on 12<sup>th</sup> Street would be replaced with new awnings with hotel and/or retail signage on them. Several windows would be installed along the south side of the OPO Building roof, flush with the existing roof.

The Action Alternative would alter the 12<sup>th</sup> Street viewshed by introducing new elements along the periphery of the site. The primary character of the viewshed would remain a tree-lined street defined by a consistent building line. At the edge of the view corridor, views of outdoor dining features, particularly the umbrellas, would be filtered through street trees. The roof windows would be visible at points along 12<sup>th</sup> Street and would appear to expand the existing row of dormer windows, which are visible behind the rows of windows at the IRS Building. Given the low height of the outdoor dining features in contrast to the height of buildings and their location at the edge of the viewshed, and the existing windows at the south side of the OPO Building, the Action Alternative would result in minor impacts on views along 12<sup>th</sup> Street.

*Views along 11<sup>th</sup> Street*

The Action Alternative would remove the plaza, including street trees, two landscape trees, and sidewalk furniture from the east side of the OPO site. In its place, a curb cut and driveway would be installed as a visual extension of 11<sup>th</sup> Street. A low landscape planter would separate the entry and exit points of the driveway. Canopies would be installed to indicate entrance points to the east side of the OPO and to the Annex and first floor window awnings on the east side of the building would identify restaurants and/or retailers. Several windows would be installed flush to the existing roof along the central and southern portions of the 11<sup>th</sup> Street side of the OPO Building roof, flush with the existing roof.

Under this alternative, the 11<sup>th</sup> Street viewshed character looking south from downtown would remain that of a roadway defined by mid-rise buildings. However, the terminus point would be altered from filtered views of the Annex, IRS Building, and pedestrian plaza, to a driveway with landscape features and more open views of the Annex and IRS Building. The view corridor would appear deeper due to the removal of trees and the addition of the linear driveway and landscape planter. The window awnings along 11<sup>th</sup> Street would be minimally visible, but due to their relatively small size, would not noticeably intrude into the visual corridor, similar to existing conditions. The roof windows would be visible, but would not distract views

along the view corridor due to their placement at the central and southern portions of the building. As a result, there would be minor-to-moderate impacts, depending upon the design of the entry canopy on views along 11<sup>th</sup> Street.

No Action Alternative

Under the No Action Alternative, improvements to the OPO Building and site would not be undertaken. Thus, impacts to visual resources would be negligible.

**3.6.4 What Measures Would be Undertaken to Reduce Visual Impacts?**

The preferred selected developer would, as the design develops, continue to seek to minimize impacts to viewsheds and would take into consideration the following:

- Elements within the viewshed, such as outdoor dining tables and chairs, signage, and especially entry canopies, should be carefully designed to complement the architecture and should be placed close to the building, to the extent possible. In the area along Pennsylvania Avenue, as applicable, these must conform to PADC's Pennsylvania Avenue Plan or otherwise approved through the plan amendment process under the 1996 NCPC, GSA, NPS MOA.
- Signage used at the OPO should be low and unobtrusive, and consist of materials that are in

keeping with the built environment at the site or sensitive to the architectural design. In the area along Pennsylvania Avenue within PADC boundaries, it must conform to PADC's Pennsylvania Avenue Plan or otherwise be approved through the plan amendment process under the 1996 NCPC, GSA, and NPS MOA.

- At the 11<sup>th</sup> Street driveway, new signage should also be located low to the ground.

The conceptual design for the signage and streetscape elements will be refined through coordination with review agencies, including the Commission of Fine Arts (CFA), the DC State Historic Preservation Office (SHPO), NCPC, and, as appropriate, for the PADC Pennsylvania Avenue Plan, NPS.

### 3.7 VEGETATION

#### 3.7.1 What Type of Vegetation is Located at the Old Post Office?

Vegetation at the project site primarily consists of street trees and landscape plantings. Along Pennsylvania Avenue, there are a total of 22 willow oaks (*Quercus phellos*) between 10<sup>th</sup> and 12<sup>th</sup> Streets. These street trees form a single line in front of the OPO and a staggered double line in front of the IRS Building. Perimeter security planters with low landscaping materials also run along Pennsylvania Avenue in front of the IRS Building, the Annex plaza, and portions of the OPO. Two lindens (*Tilia*) grow in the Annex plaza. Additional low landscape material lines the stairs leading to the lower level of the OPO and along the eastern portion of the IRS Building adjacent to the plaza and to Pennsylvania Avenue. Along 12<sup>th</sup> Street at the northeast intersection with Pennsylvania Avenue, there are three street trees, honey locusts (*Gleditsia triacanthos*). The C Street plaza area contains a total of eleven honey locusts: six line the OPO near the loading area and five are in tree boxes near 12<sup>th</sup> Street. A zelkova (*Zelkova serrata*) is located in a landscape planter area at the plaza's entrance at 12<sup>th</sup> Street. The C Street plaza area also contains low landscape plantings adjacent to the IRS Building.

#### 3.7.2 How Would Vegetation be Affected by the Project?

##### Action Alternative

Under the Action Alternative, the proposed action would remove two street trees along Pennsylvania Avenue, at the intersection with 11<sup>th</sup> Street; these street trees are located in land currently under NPS jurisdiction. Two trees within the Annex plaza, perimeter security planters, and landscaping along the downstairs OPO entrance of the Annex plaza would be removed; the security planters in front of the IRS Building would remain, although some would be repositioned. In their place, a linear landscape planting area in the driveway would be installed along the ramp and sidewalk. A new tree would be installed near the Annex entrance. The existing landscape border near the stairs would be replaced with a reconfigured landscape area. The landscape borders of the IRS Building would remain except the Annex garage entrance area. Overall, there would be a combined net loss of three trees along Pennsylvania Avenue and within the Annex plaza.

Along 12<sup>th</sup> Street, the three street trees near Pennsylvania Avenue would remain. The tree near the C Street plaza entrance would remain and the plaza would feature an expanded planting area. The other existing trees within the C Street Plaza would be removed. Near the loading area, the Action Alternative would install an expanded planting

area, which would include six new trees, and the placement of one tree near the Annex connection with the OPO Building, resulting in a net loss of four trees within the C Street plaza. In addition, the Annex would feature a green roof. Primarily low plantings specifically identified as appropriate would compose the green roof. Overall, impacts to existing vegetation would be minor because the removal of plaza trees and landscaping would be largely offset by the addition of new trees, and the installation of a green roof.

#### No Action Alternative

Under the No Action Alternative, improvements to the OPO Building and site would not be undertaken. Thus, impacts to vegetation would be negligible because no trees would be removed.

### **3.7.3 What Measures Would be Undertaken to Reduce Impacts to Vegetation?**

The preferred selected developer would coordinate with the DDOT's Urban Forestry Administration to obtain, as required, Urban Forestry Administration's Special Tree Removal Permit. Where feasible, the developer would seek to preserve additional mature trees, or incorporate more trees into the design as it progresses.

### 3.8 STORMWATER MANAGEMENT

#### 3.8.1 How is Stormwater Managed in the Vicinity of the Site?

The OPO site is located within the Potomac River watershed in an urbanized setting and site where drainage that has been altered from its natural patterns. The OPO site is primarily made up of impervious surfaces that do not allow stormwater to infiltrate into the ground, including the paved plazas, sidewalks, and driveways surrounding the building, as well as the roofs of the OPO Building and the Annex. On the north, east, and west sides of the OPO, the landscape is comprised almost entirely of impervious surfaces. On the south side of the OPO and at the Annex, 95% of the landscape is impervious.

Excessive rainfall that cannot soak into the ground flows off of the site as stormwater runoff and into the storm drains and combined sewer lines located along the periphery of the site. Combined sewer lines convey both stormwater and sanitary sewage to the DC Water and Sewer Authority (DC Water) storm sewer system. Stormwater conveyed in combined sewer lines is treated at DC Water's Blue Plains Wastewater Treatment Plant. During extreme stormwater events, if the system becomes overloaded, combined sewer overflows (CSOs) may discharge directly into the Potomac River, negatively impacting water quality. The DC governing body for stormwater management is the

Stormwater Management Section of the District of Columbia Department of the Environment (DDOE).

#### 3.8.2 How Would Stormwater Management be Affected by the Proposed Project?

As a result of the Energy Independence and Security Act of 2007 (EISA), federal projects of 5,000 square feet or more must maintain or return to pre-development hydrological conditions. DDOE requires more stringent provisions to ensure stormwater quantity control is implemented to pre-development levels at the site, regardless of the extent of existing impervious conditions. Executive Order 13508, *Chesapeake Bay Protection and Restoration*, generated guidance on stormwater management practices for federal facilities located in the Chesapeake Bay watershed in order to control non-point source pollution and meet EISA requirements.

Per DDOE standards, the total disturbed area outside of the buildings, including the disturbed area within the right of way, contributes to the project's stormwater obligation. The redevelopment of the OPO would disturb approximately 15,000 square feet, which requires the project to provide stormwater management measures.

The amount of stormwater treatment volume is determined by choosing the higher value of either quantity control volume or the quality control volume. Quantity

control volume is determined by comparing the limits of disturbance area in an undisturbed, meadow condition during a 2-year storm to the limits of disturbance area of the actual post-developed condition during a 15-year storm. Quality control volume is determined by assuming 0.5" of runoff depth for all parking lots / roads, and 0.3" of runoff depth for all sidewalks and rooftops. For the OPO redevelopment, the quantity control volume is the controlling number at 630 cubic feet.

The redevelopment of the OPO would decrease the amount of impervious surfaces on the site and add pervious surfaces and vegetation. In addition to the existing vegetated surface, approximately 10,000 square feet of green roof technology would be added on the roof of the Annex building. The addition of the green rooftop terrace on the Annex would increase the vegetative cover at the site and allow for greater stormwater management practices. Initial calculations indicate that the proposed 10,000 square feet of green roof area would provide about double the minimum requirements (630 cubic feet).

A detailed stormwater management plan would be prepared for the project. The intent of the stormwater management plan would be to meet the storm water runoff requirements under Section 438 of the Energy Independence and Security Act by the Site-Specific Hydrologic Analysis Option. By providing green roof technology, the overall amount of site impervious area

would be decreased when compared to the existing site condition. Therefore, the post-developed construction flow rates and runoff volumes would not exceed the pre-developed condition.

The reduction in impervious surfaces and increase in vegetation would result in beneficial impacts to stormwater management. These measures would help to promote infiltration at the site, increase the amount of stormwater utilized by vegetation, reduce the velocity and amount of stormwater runoff from the site during intense storm events, help to filter and treat stormwater before it enters DC Water's storm sewer system, and meet the EISA and DDOE pre-development stormwater control requirements.

There could be minor short-term construction-related impacts to stormwater due to increased sediment flows; however, this would be minimized by implementing best management practices. Overall, long-term impacts to stormwater management would be beneficial.

#### No Action Alternative

Under the No Action Alternative, the site's impervious surfaces and existing stormwater management conditions would remain as no changes would be undertaken at the site. Therefore, impacts to water resources would be negligible and impacts from existing stormwater runoff would continue.

### **3.8.3 What Measures Would be Undertaken to Reduce Impacts to Stormwater?**

During construction, the preferred selected developer would employ best management practices to minimize sediment loads in stormwater runoff and to protect water quality. The preferred selected developer would coordinate the development of a sediment and erosion control plan with the District Department of the Environment (DDOE).

The preferred selected developer would follow guidance provided in GSA's P100: Facilities Standards for Public Buildings Service for the development of the stormwater management plan, including designing the plan as per Section 438 of the Energy Independence and Security Act of 2007 and coordination of the plan with local authorities, which would include DDOE.

The preferred selected developer would consult with DC Water and DDOT prior to any relocation or reconstruction of existing storm drains or storm sewers that could be required during construction activities at the site.



### 3.9 FLOODPLAINS

#### 3.9.1 What are the Current Conditions at the Old Post Office?

Federal activities must comply with the Floodplain Management Executive Order 11988, CFR 1977. Per Executive Order 11988, federal agencies are required to avoid adverse effects associated with the occupancy and modification of floodplains to the extent possible, thereby minimizing flood risk and risks to human safety. An eight-step decision-making process for floodplain management and wetlands protection has been outlined by 44CFR 9.6 and in GSA's Floodplain Management Desk Guide (see Figure 3-14).

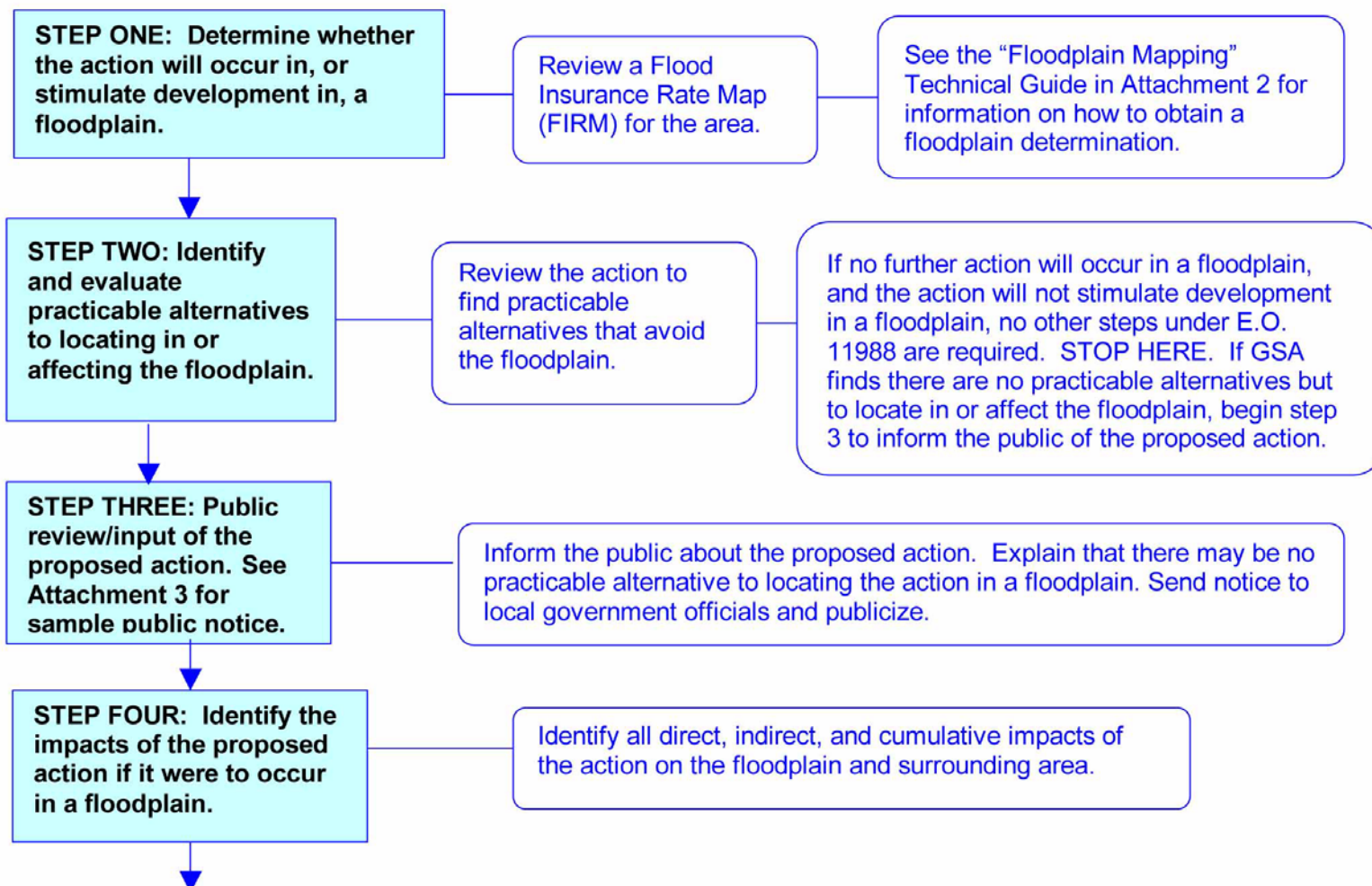
The project site is within a high risk flood zone--Special Flood Hazard Areas (SFHA) or 100-year floodplain--designated as Zone A in accordance with the Federal

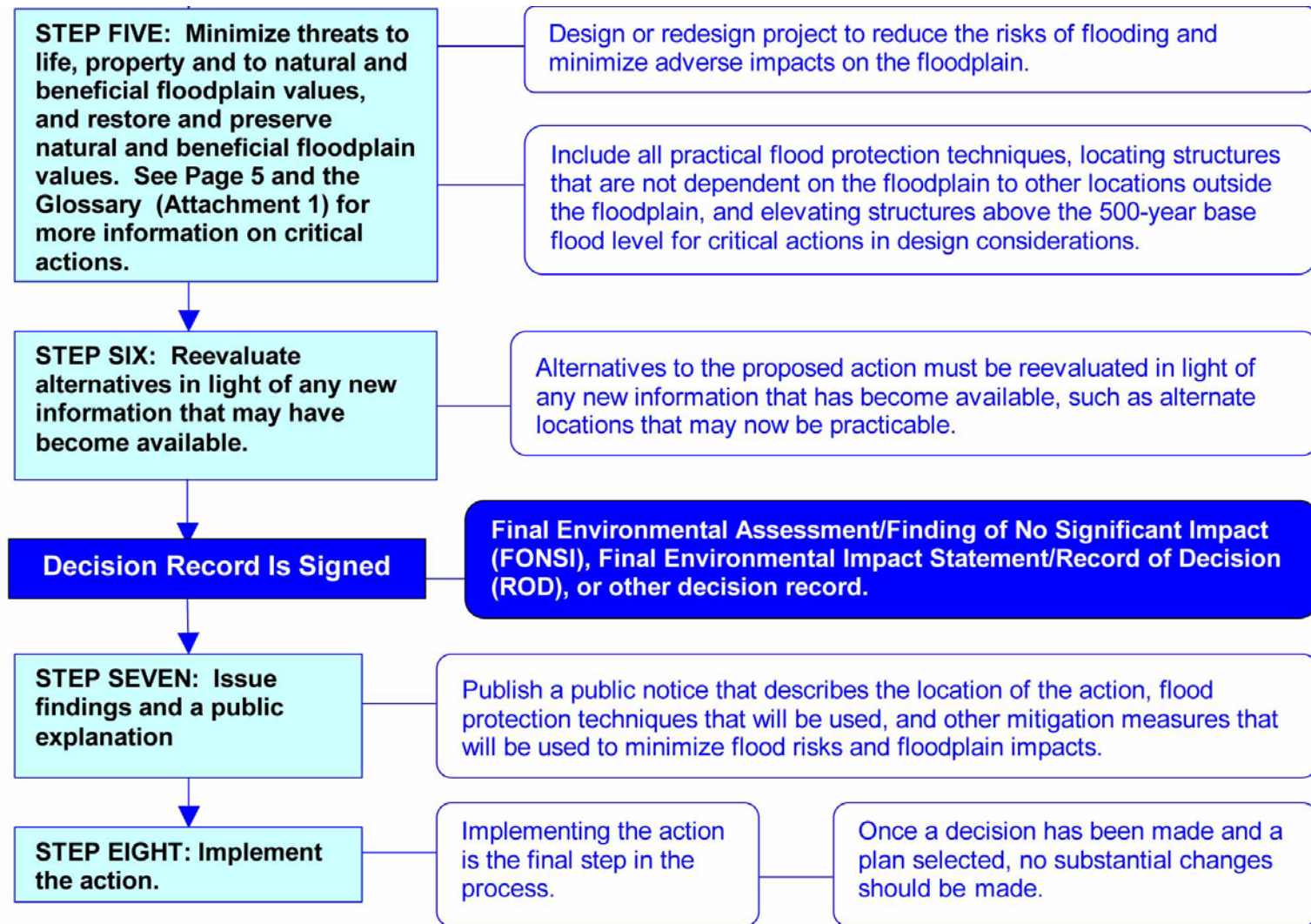
Emergency Management Agency Flood Insurance Rate Map (FIRM), effective date September 27, 2010 (FEMA 2010). According to the FIRM, the Zone A designation indicates a special flood hazard area that is subject to inundation by the one percent annual chance flood (FEMA 2010). The District Department of the Environment (DDOE) is the Floodplain Administrator and the National Flood Insurance Program coordinating agency for the District of Columbia.

The Federal Triangle is the lowest point of a large, predominantly impervious drainage area of the District; excess stormwater from the upland areas flows down to the Federal Triangle, which exacerbates the flooding. In addition, the Federal Triangle is relatively flat, preventing water on the surface from easily flowing into catch basins. This causes ponding even during small rain events (DC Water 2009). For hurricane events, the storm surge elevations in this area are 6.8, 12.6, 18.1, and 26.1 feet for hurricane Categories I, II, III, and IV, respectively (FEMA 2009).

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### WHAT ARE THE EIGHT STEPS OF FLOODPLAIN COMPLIANCE?





**Figure 3-14: Eight-Step Floodplain Compliance Process**

*Source: GSA Environmental Management Floodplain Management Desk Guide*

### 3.9.2 How Would Floodplains be Affected by the Proposed Project?

#### Action Alternative

The OPO site is located within a 100-year floodplain; therefore, future redevelopment of the site would potentially result in direct impacts to floodplains. GSA has evaluated the redevelopment of the OPO in accordance with the eight-step process required for actions that may occur in a floodplain. The following describes GSA's compliance with the eight-step process.

*Step 1: Determine whether the action will occur in a floodplain:* GSA has identified the OPO site is located within the 100-year floodplain, based on FEMA Flood Insurance Rate Map (1100010019C, revised September 27, 2010). GSA has also informed the preferred selected developer that the property is located within a floodplain.

*Step 2: Identify and evaluate practicable alternatives to locating or affecting a floodplain:* Because of the nature of the proposed action, redevelopment of the OPO in accordance with Public Law 110-359, there is no practicable alternative location for the redevelopment of the OPO.

*Step 3: Provide public review of the action:* Public involvement has occurred during the scoping process.

Additional public involvement was provided during the 30-day public review of the Draft EA.

*Step 4: Identify Impacts if the Proposed Action were to occur in the floodplain:* The OPO is an existing historic building whose redevelopment would not affect flood elevations as no new structures would be constructed. As a result, the OPO redevelopment would not adversely and directly affect the floodplain. Specifically, because the site is already developed, there would be no net loss of the beneficial or natural values of the floodplain from redevelopment of the OPO. The preferred selected developer of the OPO would be required to adhere to appropriate building practices for construction in a floodplain.

While the project is not subject to local building codes GSA will use its *Facilities Standards for the Public Building Service*, commonly referred to as P100, as building standards (GSA 2010). Use of the P100 is consistent with 40 USC § 3312 and nationally recognized codes.

As part of its agency wide risk management and compliance with Section 8(i) of Executive Order (EO) 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*<sup>1</sup> and subsequent Implementing Instructions<sup>2</sup> issued by the Council of Environmental Quality (CEQ), GSA

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<sup>1</sup> [www.whitehouse.gov/assets/documents/2009fedleader\\_eo\\_rel.pdf](http://www.whitehouse.gov/assets/documents/2009fedleader_eo_rel.pdf).

<sup>2</sup> [www.whitehouse.gov/sites/default/files/microsites/ceq/adaptation\\_final\\_implementing\\_instructions\\_3\\_3.pdf](http://www.whitehouse.gov/sites/default/files/microsites/ceq/adaptation_final_implementing_instructions_3_3.pdf).

is operationalizing its agency-wide climate change adaptation plan. The plan was developed based on GSA's evaluation of climate change risks (incremental change and climate variability) and specific vulnerabilities that GSA must overcome to ensure its mission delivery in both the short and long terms.

As part of the Federal Climate Change Adaptation Strategy, GSA is committed to securing the Federal property investment, which is critical infrastructure supporting the delivery of all government services to the public. The outcomes of the recent climate risk assessment of the IRS Headquarters in the National Capital Region (which used the referenced paper), outreach efforts with federal customers and NCPC and partnering with US Global Change Research Program, National Oceanic and Atmospheric Administration, NASA, USACE, EPA position GSA to provide innovative, expert solutions to the myriad challenges posed by climate change adaptation in a dynamic policy and fiscal environment. Because it is not possible to predict the precise occurrence of future risks (to foresee highly improbable "black swan" events),<sup>3</sup> positioning GSA with robust, resilient capacity is imperative to successfully manage risks from climate change.

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<sup>3</sup> Taleb, Nassim Nicholas (2007), *The Black Swan: The Impact of the Highly Improbable*, Random House, ISBN 978-1-4000-6351-2.

Overall floodplain conditions are expected to change over time as a result of sea level rise related to climate change. The article *Prediction and Impact of Sea Level Rise on Properties and Infrastructure of Washington, DC* studies the potential sea level rise and the resulting impacts on buildings within portions of the District of Columbia (Ayyub, Braileanu, Qureshi 2011). As stated in this article, an estimated five meter rise in sea level would flood 46 government buildings, including the Internal Revenue Service and Department of Justice Buildings, both of which are adjacent to the OPO. While not specifically identified in the article, it could be inferred that the OPO would also be affected. The article states that "Although SLR [sea level rise] may not reach these high levels in 100 years, these levels might be reached during storms." Therefore, indirect and direct impacts to floodplains would be adverse and minor.

*Step 5: identify measures that would be implemented to minimize threats to life and property and floodplain values:* The 2009 Federal Triangle Stormwater Drainage Study evaluated seven alternatives to address stormwater management in the Federal Triangle (DC Water 2009). Among these is the use of Low Impact Development Strategies (Green Infrastructure) to reduce stormwater runoff.

The proposed action will reduce the impervious coverage of the site, which is currently approximately 99% of the

site. The approximately 10,000 s.f. of green roofs installed on the Annex roof would reduce stormwater runoff at the site. Additionally, the preferred selected developer will implement a stormwater management plan and decrease impervious surfaces at the site, thereby increasing absorption of stormwater runoff and enhancing the natural values of the floodplain.

As part of the redevelopment of the OPO, the preferred selected developer would disconnect the utilities that are currently fed from the IRS Building. Disconnection from the IRS Building eliminates a flood pathway to the site and minimizes threats to life and property at the site. Additional measures to minimize threats to life and property would be accomplished by locating guest rooms at first floor level or higher and installing measures to limit water infiltration into the OPO and the mechanical equipment. Only back of house hotel and restaurant activities, parking, retail, and other non-occupation activities (no guest rooms) would be located in the basement of the OPO Building and Annex.

The GSA's Floodplain Management Desk Guide defines a critical action as "any activity for which even a slight chance of flooding would be too great." Examples of such include new courthouses, storage of irreplaceable records, and child care facilities. This action does not meet the definition of a critical action as outlined in GSA's floodplain management desk guide, and therefore is not considered a

critical action. Because the action is not a critical action, aggressive design measures are not required to minimize threats to property by elevating the structure above both the 100-year and 500-year flood elevations.

During the 2006 rain event that flooded the Federal Triangle, the Annex experienced flooding in the basement floor. The rehabilitation of the property would modernize the facility, with measures to limit water infiltration into the OPO, including the installation of sump pumps, waterproofing measures, and back flow preventers on the storm and sanitary lines. Additionally, as mentioned above, the preferred selected developer would undertake measures to separate utilities from the IRS Building, eliminating a flood pathway.

In addition, the NPS and the United States Army Corps of Engineers (ACOE) are currently replacing the Potomac Park levee system. The new facilities, located along 17<sup>th</sup> Street at the National Mall, will stop a 100-year flood south of Constitution Avenue, protecting downtown Washington and the monumental core.

*Step 6: Reevaluate Alternatives that may have come to light:* No additional information regarding the proposed action has been revealed since this analysis began. District Department of the Environment commented on the action during the public review of the Draft EA. The Final EA responds to DDOE's comments. ACOE responded to the Draft EA indicating that the proposed action would not

require any authorizations from the Department of the Army. GSA is providing the Final EA and FONSI to these, other regulatory agencies, and the public for review.

*Step 7: Issue Findings and a Public Statement:* Step 7 is accomplished through the issuance of the Finding of No Significant Impact and the Final EA. Through the eight-step process, GSA has determined that there is no practicable alternative to locating the proposed action in the 100-year floodplain.

*Step 8: Implement the action.* Implementation of the action will include mitigation measures identified in Step 5.

#### No Action Alternative

Under the No Action Alternative, improvements to the OPO Building and site would not be undertaken. No waterproofing or stormwater management improvements at the site would occur. As a result, flooding of the building could occur during large storm events. Therefore, the impacts to floodplains would be minor.

### **3.9.3 What Measures Would be Undertaken to Reduce Impacts to Floodplains?**

The mitigation measures that would be undertaken to reduce impacts to floodplains are described in Step 5 of the GSA floodplain compliance process. These measures limit water infiltration into the OPO, through the installation of sump pumps, waterproofing measures, and back flow preventers on the storm and sanitary lines. Furthermore, the rehabilitation would separate the Annex from the IRS building.

In order to minimize threats to life, the basement of the OPO Building and Annex will serve non-occupation functions, such as parking, retail, and back-of-house hotel and restaurant activities. No guest rooms would be located in the basement, as shown in Figure 2-1.

As part of the redevelopment of the OPO, the preferred selected developer would disconnect the utilities that are currently fed from the IRS Building. Disconnection from the IRS Building eliminates a flood pathway to the site and minimizes threats to life and property at the site. Additional measures to minimize threats to life and property would be accomplished by locating guest rooms at first floor level or higher and limiting water infiltration of the mechanical equipment.

Additionally, the preferred selected developer would implement a stormwater management plan and decrease impervious surfaces at the site, thereby increasing absorption of stormwater runoff and enhancing the natural values of the floodplain.



### 3.10 AIR QUALITY

#### 3.10.1 What are the Current Air Quality Conditions at the Old Post Office?

The US Environmental Protection Agency (EPA), under the requirements of the 1970 Clean Air Act (CAA) as amended in 1977 and 1990, has established National Ambient Air Quality Standards (NAAQS) for six contaminants, referred to as criteria pollutants (40 CFR 50). These are carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), particulate matter (PM<sub>10</sub>: diameter ≤ 10 micrometers, and PM<sub>2.5</sub>: diameter ≤ 2.5 micrometers), lead (Pb), and sulfur dioxide (SO<sub>2</sub>). The NAAQS include primary and secondary standards. The primary standards were established at levels sufficient to protect public health with an adequate margin of safety. The secondary standards were established to protect the public welfare from the adverse effects associated with pollutants in the ambient air. Table 3-1 shows the primary and secondary standards.

Areas where ambient concentrations of a criteria pollutant are below the corresponding NAAQS are designated as being in "attainment" for this pollutant. Areas where a criteria pollutant level exceeds the NAAQS are designated as being in "nonattainment." O<sub>3</sub> nonattainment areas are categorized as marginal, moderate, serious, severe, or extreme. CO and PM<sub>10</sub> nonattainment areas are categorized

as moderate or serious. The proposed action would take place in the District of Columbia, an area designated as a:

- Moderate nonattainment area for O<sub>3</sub>
- Nonattainment area for PM<sub>2.5</sub>
- Attainment area for all other criteria pollutants.

#### *State Implementation Plan*

The CAA, as amended in 1990, mandates that state agencies adopt State Implementation Plans (SIPs) that target the elimination or reduction of the severity and number of violations of the NAAQS. SIPs set forth policies to expeditiously achieve and maintain attainment of the NAAQS. The SIP currently applicable to the OPO site is the *Plan to Improve Air Quality in the Washington, DC-MD-VA Region, State Implementation Plan for 8-Hour Ozone* (MWCOCG, May 23, 2007). The plan aims to improve air quality in the Washington, DC region so as to meet the eight-hour O<sub>3</sub> standard by 2009. It includes a reasonable further progress plan for 2002-2008; an attainment plan; an analysis of reasonably available control measures; an attainment demonstration; contingency plans for attainment; and mobile source budgets for 2008, 2009, and 2010.

#### *Clean Air Act Conformity Rule*

The Clean Air Act Amendments (CAAA) of 1990 expand the scope and content of the act's conformity provisions in

terms of their relationship to a SIP. Under Section 176(c) of CAAA, a project is in “conformity” if it corresponds to a SIP’s purpose of eliminating or reducing the severity and number of violations of the NAAQS and achieving their expeditious attainment. Conformity further requires that such activities would not:

- cause or contribute to any new violations of any standards in any area.
- increase the frequency or severity of any existing violation of any standards in any area.
- delay timely attainment of any standard or any required interim emission reductions or other milestones in any area.
- The EPA published final rules on general conformity (40 CFR Parts 51 and 93) in the Federal Register on November 30, 1993 and further updated final rules on March 24, 2010. The rules apply to federal actions in nonattainment areas for any of the criteria pollutants. The rules specify *de minimis* emission levels by pollutant to determine the applicability of conformity requirements for a project. In this case, the project area is located in a moderate nonattainment area for the O<sub>3</sub> standard in an O<sub>3</sub> transport region and a nonattainment area for the PM<sub>2.5</sub> standard. The corresponding *de minimis* are 100 tons per year (tpy) (91 metric tpy) for NO<sub>x</sub>,

PM<sub>2.5</sub>, and SO<sub>2</sub>; and 50 tpy (45 metric tpy) for volatile organic compound (VOC). (SO<sub>2</sub> is a precursor of PM<sub>2.5</sub>; NO<sub>x</sub> and VOC are O<sub>3</sub> precursors.)

### 3.10.2 How Would Air Quality be Affected by the Redevelopment?

#### Action Alternative

Under the Action Alternative certain project-related demolition and construction activities would occur. These activities can be expected to cause the following short-term minor air quality impacts:

- Fugitive dust would be generated by demolition and construction operations.
- Emissions of criteria pollutants (VOC and NO<sub>x</sub> as precursors of O<sub>3</sub>, CO, PM<sub>10</sub>, PM<sub>2.5</sub> including its precursor SO<sub>2</sub>) would result from demolition and construction activities such as:
- Use of diesel-powered and gas powered demolition and construction equipment.
- Construction workers’ commutes.

It is anticipated that majority of construction activity would be limited to indoor renovation activities, which would generate negligible nonattainment emissions well below the applicable *de minimis* threshold. The primary outdoor

construction activity would be the installation of the driveway at Pennsylvania Avenue and 11<sup>th</sup> Street and the reconfiguration of the C Street plaza, including the removal of the existing glass and steel exterior structure at the south entrance of the OPO Building. These very limited outdoor activities are common for a small scale construction project in the DC area and thus result in negligible emissions. Similarly, because no new parking would be available in the vicinity of the site during construction and because current employees in the OPO would no longer be commuting to the site, emissions from construction workers commuting to the site would be offset by the elimination of current employees at the OPO commuting to the site, result in minimal change in vehicular emissions during construction period. Consequently, the Action Alternative would result in negligible short-term impacts to air quality.

#### *Clean Air Act General Conformity Rule Applicability*

Under the general conformity rule (GCR), total annual emissions resulting from proposed federal actions should be compared to the applicable *de minimis* levels on an annual basis. As defined by the GCR, if the emissions of a nonattainment criteria pollutant (or its precursors) do not exceed the *de minimis* level, the federal action has minimal air quality impact and is determined to conform for the pollutant under consideration. No further analysis is necessary. Conversely, if the total direct and indirect emissions of a pollutant are above the *de minimis* level, a

formal general conformity determination is required for that pollutant. For proposed federal actions in District of Columbia, which is an 8-hour O<sub>3</sub> moderate nonattainment area in an O<sub>3</sub> transport region and PM<sub>2.5</sub> nonattainment area, the *de minimis* levels are 100 tons per year (tpy) for NO<sub>x</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub>, and 50 tpy for VOCs.

As discussed previously, given the scale of the project with majority of construction and demolition actions being related to indoor renovation activities, the Action Alternative would generate negligible nonattainment emissions that would be well below the applicable *de minimis* thresholds. Therefore, a formal conformity determination is not required and air quality impacts under the proposed Action Alternative would be negligible

#### *Long-term Operational Traffic-related Hot Spot Air Quality Impact*

The Action Alternative would alter the number of vehicular trips generated (see Table 3-4 on page 3-82) per traffic analysis results discussed in Section 3-11. The proposed redevelopment would include a hotel with approximately 267 guest rooms, retail and restaurant space, spa, and meeting rooms; the Annex would include a conference facility with ballroom(s), meeting spaces and banquet facilities. In addition, the proposed action would add up to 150 parking spaces at the project site in the existing basement of the Annex building. As a result, there would be

Pollutant and Averaging Time	Primary Standard <sup>a</sup>		Secondary Standard <sup>a</sup>	
	µg/m <sup>3</sup>	ppm	µg/m <sup>3</sup>	ppm
Carbon Monoxide 8-hour concentration 1-hour concentration	10,000 <sup>b</sup> 40,000 <sup>b</sup>	9 <sup>b</sup> 35 <sup>b</sup>	Same as primary	
Nitrogen Dioxide Annual Arithmetic Mean 1-hour 98 Percentile/3 years	100 188	0.053	Same as primary	
Ozone 8-hour concentration	157 <sup>c</sup>	0.075 <sup>c</sup>	Same as primary	
Particulate Matter PM <sub>2.5</sub> : Annual Arithmetic Mean 24-hour Maximum PM <sub>10</sub> : 24-hour concentration	15 <sup>d</sup> 35 <sup>e</sup>  150 <sup>b</sup>	- -  -	Same as primary	
Lead Quarterly Arithmetic Mean	1.5	-	Same as primary	
Sulfur Dioxide 3-hour concentration 1-hour 99 Percentile/3 years	-	- 0.075	1300 <sup>b</sup>	0.50 <sup>b</sup>
Notes: a. µg/m <sup>3</sup> = microgram/cubic meter; ppm = part per million b. Not to be exceeded more than once per year on average over 3 years. c. 3-year average of the 4th highest 8-hour concentration may not exceed 0.075 ppm. d. Based on 3-year average of annual averages. e. Based on 3-year average of annual 98th percentile values.				

**Table 3-1: National Ambient Air Quality Standards***Source: 40 CFR 50*

a net gain of 34 trips in and 46 trips out during the AM peak; 44 trips in and 17 trips out during the PM peak; and 52 trips in and 36 trips out during the Saturday peak.

Each of the intersections function at an acceptable LOS during the studied time periods: AM peak period, the PM peak period, and the Saturday midday peak period. As a result of the Action Alternative, one intersection, Constitution Avenue at 12<sup>th</sup> Street, would be more congested during the PM Peak Hour from LOS C to LOS D; the remaining intersections would function at LOS C or better.

In addressing traffic-related air quality impacts due to a change in local traffic pattern as a result of a proposed action, a project-level microscale analysis at congested intersections or free flow sites (i.e., hot spot) for CO and PM (PM<sub>10</sub> and PM<sub>2.5</sub>) is typically considered. A microscale analysis (i.e., hot spot analysis) of traffic-related impacts at congested intersections or free flow sites involves an estimate of localized pollutant concentrations for direct comparison to the NAAQS. However, given the minimal increase to peak period trips and the approximate two-second increase in delay at the worst-case intersection of Constitution Avenue and 12<sup>th</sup> Street, it is anticipated that the associated minimal change in congestion would not cause noticeable hot spot concentration impact for both CO and PM. As a result, there would be negligible long-term impacts on air quality.

#### No Action Alternative

Under the No Action Alternative, existing conditions would continue. Because no activity that would alter air quality would occur, there would be no impact.

#### **3.10.3 What Measures Would be Undertaken to Reduce Impacts to Air Quality?**

The preferred selected developer would employ best management practices during construction to control fugitive dust.

### **3.11 VEHICULAR AND NON-VEHICULAR TRANSPORTATION**

#### **3.11.1 What are the Current Vehicular Traffic Conditions at the Old Post Office?**

The vehicular traffic in the vicinity of the site was documented in the Old Post Office Redevelopment Transportation Study (GSA 2012). Given the location of the OPO at Pennsylvania Avenue and 12<sup>th</sup> Street, the vehicular circulation study area includes the footprint of the OPO site and the following five adjacent intersections:

- Pennsylvania Avenue @ 12th Street
- Pennsylvania Avenue @ 11th Street
- Pennsylvania Avenue @ 10th Street
- Constitution Avenue @ 12th Street
- Constitution Avenue @ 10th Street

Roadways within the study are listed below.

- Pennsylvania Avenue, functionally classified as a Principal Arterial, is an east-west, eight-lane, undivided street carrying approximately 31,500 vehicles per day (vpd) at the site's frontage. There is a center bike lane from its intersection with 15<sup>th</sup> Street to its intersection with 3<sup>rd</sup> Street. No public on-street parking is allowed in this segment of Pennsylvania Avenue.

- Constitution Avenue, functionally classified as a Principal Arterial, is an east-west, eight lane, undivided street carrying approximately 31,700 vpd at the site's frontage. No on-street parking is allowed during peak hours (Monday-Friday, 7:00-9:30 AM and 4:00-6:30 PM). During off-peak periods, when parking is allowed, Constitution Avenue operates as a six-lane roadway. There are no designated bicycle lanes on Constitution Avenue within the study area.
- 12<sup>th</sup> Street, functionally classified as a Principal Arterial, is a north-south, four lane, undivided street carrying approximately 16,300 vpd at the site's frontage. On-street parking is allowed at all times of day. There are no designated bicycle lanes on 12<sup>th</sup> Street within the study area.
- 11<sup>th</sup> Street, functionally classified as a Minor Arterial, is a north-south, four lane, undivided street carrying approximately 13,700 vpd within the study area. 11<sup>th</sup> Street, currently terminates as the northern leg of its intersection with Pennsylvania Avenue. North of Pennsylvania Avenue, on-street parking is allowed at all times of day. There are no designated bicycle lanes on 11<sup>th</sup> Street within the study area.
- 10<sup>th</sup> Street, functionally classified as a Collector, is a north-south, four lane street, divided by a raised

median. 10<sup>th</sup> Street carries approximately 3,200 vpd within the study area and serves as a layby for several Metrobus routes. On-street parking is allowed in designated sections of 10<sup>th</sup> Street between its intersections with Pennsylvania Avenue and Constitution Avenue. There are no designated bicycle lanes on 10<sup>th</sup> Street within the study area.

### Traffic Volumes

To determine traffic volumes in the roadway network in the vicinity of the OPO, traffic counts were performed at each of the five intersections within the study area during April 2012 for each of the following time periods:

- Weekday AM peak period (7am – 10am)
- Weekday PM peak period (4pm – 7pm)
- Saturday midday peak period (10am – 2pm)

The existing peak travel volumes are illustrated in Table 3-2.

Existing land uses generate 113 trips in and 65 trips out of the site in the AM peak period; 16 trips in and 79 trips out of the site in the PM peak period; and 20 trips in and 18 trips out of the site during Saturday peak period. The existing land uses of the OPO Building include 212,600 s.f. office and 18,600 s.f. retail space. To determine the existing traffic volumes attributed to the current OPO Building uses,

the ITE Trip Generation rates were used. Based on these standard generation rates, these estimated numbers of existing trips were then adjusted for use of transit services, including the Federal Triangle Metrorail station directly across 11<sup>th</sup> Street from the OPO. See the attached Old Post Office Redevelopment Transportation Analysis (Appendix 4.5) for more detailed analysis.

### Traffic Level of Service

Level of Service (LOS) is a quality measurement of traffic flow in terms of speed and travel time, freedom to maneuver, comfort and convenience. There are six LOS designations, represented by the letters A through F, with LOS A representing the best operating conditions and LOS F the worst. Signalized intersection LOS is determined by seconds delay per vehicle. Table 3-3 displays the criteria used to determine LOS. Figure 3-15 graphically illustrates LOS conditions.

Each of the intersections currently function at an acceptable LOS during the studied time periods: AM peak period, the PM peak period, and the Saturday midday peak period, as shown in Table 3-4. During the AM peak period, one intersection operates at LOS A (Constitution Avenue at 10<sup>th</sup> Street), two intersections operate at LOS B (Pennsylvania at 11<sup>th</sup> and 12<sup>th</sup> Streets), one intersection operates at LOS C (Pennsylvania Avenue at 10<sup>th</sup> Street), and one intersection operates at LOS D (Constitution Avenue at

median. 10<sup>th</sup> Street carries approximately 3,200 vpd within the study area and serves as a layby for several Metrobus routes. On-street parking is allowed in designated sections of 10<sup>th</sup> Street between its intersections with Pennsylvania Avenue and Constitution Avenue. There are no designated bicycle lanes on 10<sup>th</sup> Street within the study area.

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Existing Peak Travel Volumes				
Intersection	Approach Direction	AM	PM	Saturday
Pennsylvania Avenue, NW @ 12 <sup>th</sup> Street, NW	North	1,853	1,069	933
	South	-	-	-
	East	514	753	351
	West	950	811	393
Pennsylvania Avenue, NW @ 11 <sup>th</sup> Street, NW	North	-	-	-
	South	289	548	186
	East	612	712	375
	West	1,330	849	445
Pennsylvania Avenue, NW @ 10 <sup>th</sup> Street, NW	North	292	80	44
	South	158	598	160
	East	639	1,062	481
	West	1,087	718	399
Constitution Avenue, NW @ 12 <sup>th</sup> Street, NW	North	1,933	1,146	939
	South	73	174	61
	East	1,410	1,308	948
	West	835	1,440	571
Constitution Avenue, NW @ 10 <sup>th</sup> Street, NW	North	-	-	-
	South	87	332	101
	East	1,361	1,259	951
	West	827	1,168	512

**Table 3-2: Existing Peak Travel***Source: AECOM*

Level of Service (LOS)	Signalized Intersections Average Control Delay (sec/veh)	Overall Quality of Intersection
A	Less than 10	Acceptable levels of service
B	>10-20	
C	>20-35	
D	>35-55	Acceptable level of service in Central Business Districts such as DC
E	>55-80	Level of service at capacity
F	More than 80	Level of service above capacity and generally unacceptable

**Table 3-3: Level of Service Criteria***Source: Transportation Research Board*

12<sup>th</sup> Street). During the PM peak period, the same intersection (Constitution Avenue at 10<sup>th</sup> Street) functions at LOS A, two intersections function at LOS B (Pennsylvania Avenue at 12<sup>th</sup> Street and Pennsylvania Avenue at 10<sup>th</sup> Street), and two intersections operate at LOS C (Pennsylvania Avenue at 11<sup>th</sup> Street and Constitution Avenue at 10<sup>th</sup> Street). During the Saturday peak period, two intersections operate at LOS A (Pennsylvania at 12<sup>th</sup> Street and Constitution Avenue at 10<sup>th</sup> Street) and three intersections operate at LOS B (Pennsylvania Avenue at 11<sup>th</sup> Street, Pennsylvania Avenue at 12<sup>th</sup> Street, and Constitution Avenue at 12<sup>th</sup> Street).

In addition to assessing the overall intersections, the traffic analysis also included a review of specific intersection

approaches. Based on this analysis, these approaches function at an acceptable LOS, with the exception of northbound approach at the intersection of Constitution Avenue at 12<sup>th</sup> Street during the AM and PM peak periods, which operates at LOS F. This is likely the result of a high volume of through vehicles combined with a moderate amount of left turning vehicles where there is no dedicated left turn lane or protected left turn phase. Vehicles making the left turn movement must wait for an adequate gap in southbound through traffic in a shared left-through lane, which limits the number of vehicles advancing through the intersection.

# LEVEL OF SERVICE

Highway traffic congestion is expressed in terms of Level of Service (LOS) as defined by the Highway Capacity Manual (HCM). LOS is a letter code ranging from "A" for excellent conditions to "F" for failure conditions. The conditions defining the LOS for roadways are summarized as follows:



## LOS A

Represents the best operating conditions and is considered free flow. Individual users are virtually unaffected by the presence of others in the traffic stream.



## LOS D

Represents traffic operations approaching unstable flow with high passing demand and passing capacity near zero, characterized by drivers being severely restricted in maneuverability.



## LOS B

Represents reasonably free-flowing conditions but with some influence by others.



## LOS E

Represents unstable flow near capacity. LOS E often changes to LOS F very quickly because of disturbances (road conditions, accidents, etc.) in traffic flow.



## LOS C

Represents a constrained constant flow below speed limits, with additional attention required by the drivers to maintain safe operations. Comfort and convenience levels of the driver decline noticeably.



## LOS F

Represents the worst conditions with heavily congested flow and traffic demand exceeding capacity, characterized by stop-and-go waves, poor travel time, low comfort and convenience, and increased accident exposure.

**Figure 3-15: Graphic Representation of Level of Service**

*Source: Highway Capacity Manual*

	Intersection		2012 Weekday AM Peak Hour			2012 Weekday PM Peak Hour			2012 Saturday Midday Peak Hour		
			Approach Delay (sec)	Approach LOS	Overall Delay/ LOS	Approach Delay (sec)	Approach LOS	Overall Delay/ LOS	Approach Delay (sec)	Approach LOS	Overall Delay/ LOS
1.	Pennsylvania Avenue, NW @ 12th Street, NW	EB	16.4	B	19.2/B	14.2	B	14.7/B	25.0	C	7.9/A
		WB	43.5	D		27.3	C		5.1	A	
		NB	7.3	A		5.8	A		2.8	A	
		SB	-	-		-	-		-	-	
2.	Pennsylvania Avenue, NW @ 11th Street, NW	EB	27.2	C	19.2/B	38.5	D	24.7/C	14.7	B	12.6/B
		WB	7.5	A		6.7	A		6.1	A	
		NB	-	-		-	-		-	-	
		SB	56.7	B		33.8	C		23.8	C	
3.	Pennsylvania Avenue, NW @ 10th Street, NW	EB	8.9	A	22.7/C	12.6	B	19.6/B	12.1	B	19.2/B
		WB	26.4	C		26.9	C		25.9	C	
		NB	32.3	C		25.2	C		24.1	C	
		SB	35.2	D		21.8	C		20.2	C	
4.	Constitution Avenue, NW @ 12th Street, NW	EB	29.4	C	49.9/D	20.8	C	36.2/C	15.1	B	17.7/B
		WB	12.5	B		11.2	B		10.5	B	
		NB	85.0	F		85.0	F		25.6	C	
		SB	6.0	A		13.9	B		0.4	A	
5.	Constitution Avenue, NW @ 10th Street, NW	EB	4.0	A	4.8/A	4.7	A	9.0/A	3.5	A	5.0/A
		WB	3.7	A		8.4	A		6.4	A	
		NB	-	-		-	-		-	-	
		SB	21.1	C		26.6	C		11.9	B	

**Table 3-4: 2012 Existing Intersection Approach and Overall LOS Results**

Source: AECOM 2012

### **3.11.2 How are Future Vehicular Traffic Conditions Determined?**

In order to assess future vehicular traffic conditions, several factors were considered. First, the analysis establishes conditions for the year 2016 without improvements made to the OPO site (the No Action Alternative, also referred to as the No Build Alternative in the 2012 GSA Old Post Office Redevelopment Transportation Study). The future conditions analysis includes roadway improvements and traffic generated by other development projects in the vicinity of the OPO; no such improvements or projects were identified for the OPO vicinity. Although there are other projects within downtown Washington currently under development, these locations were determined, in consultation with DDOT, to affect intersections outside the OPO study area and it was determined that these developments would not have perceptible effects on study intersections.

In order to forecast the future impacts to vehicular traffic, estimates are developed for the number of vehicle trips that would occur as part of the redevelopment, which are then added to the estimated future conditions without the project. For impacts generated by land development, proposed land uses (hotel, restaurant, etc.) are converted into vehicular trips. For a multimodal study, land uses are also translated in terms of walking, bicycle, and transit trips. The Institute of Transportation Engineers' (ITE) Trip

Generation Manual, 8th Edition provides trip generation calculations for numerous land uses by type, and is the industry standard for transportation professionals analyzing the site impact of proposed new development or infill projects.

However, the ITE trip generation rates are primarily based on studies in areas with limited transit service, where vehicle trips would be equivalent to person trips. In a downtown environment where transit is readily available, a portion of vehicle trips are converted to transit and other no-vehicular trips. Taxi trips are included in the trip generation rates.

The significant differentiator is the modal split. The WMATA Ridership Survey included modal split surveys at two hotels located at or adjacent to Metrorail stops (Crystal Gateway Marriott, and Embassy Suites Chevy Chase). The percentage of trips involving an automobile (including trips as driver and passenger) was 24% and 25%, respectively. Therefore, it is assumed that vehicle trips would make up approximately 25% of hotel trips. In addition, it is assumed that taxi uses would make up another 25% of hotel trips.

For the conference and event center at the OPO, the conference center trip generation is based on the methodology used for the Washington Convention Center. It is assumed that approximately 25% would be automobiles, with an average occupancy of 1.20 per car for those attending events at the site. For further information

regarding how these figures were calculated, refer to Appendix 4.5.

### **3.11.3 How Would Vehicular Traffic be Affected by the Redevelopment?**

#### Action Alternative

The Action Alternative would establish a driveway south of 11<sup>th</sup> Street from its existing terminus at Pennsylvania Avenue along the eastern face of the OPO Building. This would serve as the primary vehicular access point to the site, allowing a drop off/pick-up point for valet parking, taxis, and other vehicles. Deliveries would be made to the Annex through the existing drive off of 12<sup>th</sup> Street.

The establishment of the driveway would require the reconfiguration of the 11<sup>th</sup> Street and Pennsylvania Avenue intersection. It would be installed after NPS transfers jurisdiction of the area to GSA. Portions of the proposed 11<sup>th</sup> Street driveway would be in land currently under NPS jurisdiction. The curb cut and driveway would largely be installed after the NPS transfers jurisdiction to GSA of the area where the curb cut for the driveway would be located.

The traffic control devices at this intersection would be re-signalized. Reconfiguration of the intersection may require traffic control devices to be installed or modified on land along Pennsylvania Avenue (south and north sides) that is under NPS jurisdiction. GSA, along with the preferred selected developer, would coordinate with NPS regarding any necessary permits for traffic control devices located on

land that is under NPS jurisdiction, but outside the land to be transferred from NPS to GSA. The design of the curb-cut and traffic control devices would also require coordination with the District Department of Transportation.

The OPO driveway would allow full movements including right, through, and left turns out of the site. Another option for the OPO driveway (a right-in, right-out turning motion) was also explored per DDOT recommendation. When compared to the full movement analysis, the resulting impacts on traffic were similar. Furthermore, potential conflicts with pedestrian movements were almost identical under both the full movement and right-in/right-out restricted access. (GSA 2012) Because the full movement configuration for the driveway allowed a wider range of circulation options with minimal difference in potential impacts, the right-in, right-out driveway option was not considered further.

Changes to the OPO development program would alter the number of vehicular trips generated (see Table 3-5). The proposed site land use would include a hotel with 267 rooms, a 1,000-seat conference center, and other smaller size land uses such as fitness club, restaurants, café, and retail. Using industry-standard trip generation rates, adjusted for location, in coordination with DDOT, as identified in the Old Post Office Redevelopment Transportation Study and described above, this mix of uses would generate 147 trips in and 112 trips out of the site

during the AM peak period; 80 trips in and 96 trips out of the site during the PM peak period; and 72 trips in and 54 trips out of the site during the Saturday peak period (GSA 2012). As a result, there would be a net gain of 34 trips in and 46 trips out during the AM peak period; 44 trips in and 17 trips out during the PM peak period; and 52 trips in and 36 trips out during the Saturday peak period.

Trips	AM		PM		Sat	
	in	Out	in	out	in	out
Existing Generated trips	113	65	36	79	20	18
Build Generated Trips	147	112	80	96	72	54
Net Trips (Build Minus Existing)	34	46	44	17	52	36

**Table 3-5: Net Site Trip Generation**

Source: AECOM

In 2016, when the OPO would be operational, each of the intersections would function at an acceptable LOS during the studied time periods: the AM peak period, the PM peak period, and the Saturday midday peak period (see Table 3-6). During the AM peak period, one intersection would operate at LOS A (Constitution Avenue at 10<sup>th</sup> Street), two intersections would operate at LOS B (Pennsylvania Avenue at 11<sup>th</sup> Street and Pennsylvania Avenue at 12<sup>th</sup> Street), one intersection would operate at LOS C (Pennsylvania Avenue at 10<sup>th</sup> Street), and one intersection would operate at LOS D (Constitution Avenue at 12<sup>th</sup> Street).

During the PM peak period, one intersection would operate at LOS A (Constitution Avenue at 10<sup>th</sup> Street), one intersection would operate at LOS B (Pennsylvania Avenue

at 12<sup>th</sup> Street), two intersections would operate at LOS C (Pennsylvania Avenue at 10<sup>th</sup> Street and Pennsylvania Avenue at 11<sup>th</sup> Street), and one intersection would operate at LOS D (Constitution Avenue at 12<sup>th</sup> Street).

During the Saturday peak period, two intersections would operate at LOS A (Pennsylvania Avenue at 12<sup>th</sup> Street and Constitution Avenue at 10<sup>th</sup> Street), two intersections would operate at LOS B (Pennsylvania Avenue at 11<sup>th</sup> Street and Constitution Avenue at 12<sup>th</sup> Street), and one intersection would operate at LOS C (Pennsylvania Avenue at 10<sup>th</sup> Street).



	Intersection		2016 Build Weekday AM Peak Hour			2016 Build Weekday PM Peak Hour			2016 Build Saturday Midday Peak Hour		
			Approach Delay (sec)	Approach LOS	Overall Delay/LOS	Approach Delay (sec)	Approach LOS	Overall Delay/LOS	Approach Delay (sec)	Approach LOS	Overall Delay/LOS
1.	Pennsylvania Avenue, NW @ 12th Street, NW	EB	16.4	B	19.2/B	14.3	B	14.7/B	25.0	C	8.1/A
		WB	43.1	D		27.2	C		5.4	A	
		NB	7.5	A		6.0	A		3.0	A	
		SB	-	-		-	-		-	-	
2.	Pennsylvania Avenue, NW @ 11 <sup>th</sup> Street, NW	EB	27.4	C	19.6/B	38.3	D	25.1/C	14.9	B	13.5/B
		WB	7.4	A		7.6	A		6.3	A	
		NB	37.1	D		36.1	D		36.9	D	
		SB	57.0	E		34.0	C		23.9	C	
3.	Pennsylvania Avenue, NW @ 10 <sup>th</sup> Street, NW	EB	10.3	B	23.0/C	13.3	B	20.1/C	14.0	B	20.1/C
		WB	26.4	C		27.0	C		25.9	C	
		NB	32.5	C		29.6	C		25.7	C	
		SB	35.2	D		21.9	C		20.2	C	
4.	Constitution Avenue, NW @ 12 <sup>th</sup> Street, NW	EB	33.3	C	51.9/D	24.7	C	38.2/D	15.4	B	18.0/B
		WB	12.7	B		11.2	B		10.8	B	
		NB	86.8	F		87.1	F		25.8	C	
		SB	6.0	A		13.9	B		0.4	A	
5.	Constitution Avenue, NW @ 10 <sup>th</sup> Street, NW	EB	4.0	A	5.0/A	4.7	A	9.2/A	3.5	A	5.1/A
		WB	3.8	A		8.4	A		6.4	A	
		NB	-	-		-	-		-	-	
		SB	20.6	C		27.9	C		12.0	B	

**Table 3-6: Build Intersection Approach and Overall LOS Results**

Source: AECOM

In addition to the intersections, the traffic analysis also included the intersection approaches. Similar to existing conditions, these approaches would function at an acceptable LOS, with the exception of northbound approach at the intersection of Constitution Avenue at 12th Street during the AM and PM peak periods, which currently operates at LOS F. This is because 12<sup>th</sup> Street serves as one of the primary access routes connecting downtown DC with Virginia.

Overall, the small number of new vehicle trips generated by the proposed action would have negligible effect on the total trips on local roadways. As a result, there would be minor impacts on vehicular traffic.

During the rehabilitation of the OPO, vehicular traffic would be disrupted. Delivery trucks would stop at the site, sometimes blocking traffic blocking traffic lanes. Construction to reconfigure the Pennsylvania Avenue and 11<sup>th</sup> Street intersection would disrupt traffic. Traffic lanes would be temporarily closed; the preferred selected developer would coordinate lane closures or traffic disruption with DDOT through the permit process. As a result, there would be short-term minor adverse impacts on vehicular traffic during construction.

#### No Action Alternative

Under the No Action Alternative, no changes to the OPO would occur, resulting in no changes to trip generation.

Traffic volumes along Pennsylvania Avenue and Constitution Avenue would grow insignificantly. The Future No Build Year 2016 traffic volumes would be nearly identical to the Existing 2012 traffic volumes. As a result, impacts to traffic would be negligible.

#### **3.11.4 What Measures Would be Undertaken to Reduce Impacts to Vehicular Traffic?**

The preferred selected developer would during the public space permitting process:

- Closely coordinate with DDOT on the design and construction of the proposed alignment, curb cut, and associated modifications to traffic control devices at Pennsylvania Avenue, NW and 11th Streets, NW intersection.
- Develop a transportation management program (TMP) that offers on-site employees alternative modes of transportation and coordinate with DDOT the specifics of the transportation demand management program in order to tailor the TMP to the finalized land use program.
- Discourage employees commuting to work in single occupant vehicles. The preferred selected developer would restrict parking to valet parking, and only provide a limited number of parking spaces to employees (up to five).

- The preferred selected developer would charge a fee to hotel visitors and guests for valet parking.

A transfer of jurisdiction from NPS to GSA would be required in accordance with 40 U.S.C. § 8124; the land subject to the transfer of jurisdiction to GSA is depicted in Figure 2.7 and is approximately 8,300 square feet. Reconfiguration of the intersection may require traffic control devices to be installed or modified on land along Pennsylvania Avenue (south and north sides) that is under NPS jurisdiction. GSA, along with the preferred selected developer, would coordinate with NPS regarding any necessary permits for traffic control devices located on land that is under NPS jurisdiction, but outside the area to be transferred from NPS to GSA.

### **3.11.5 How do Pedestrians and Bicyclists Access the Site?**

The Old Post Office Redevelopment Transportation Study (GSA 2012), found in Appendix 4.5, describes how pedestrians and bicyclists access the site. The OPO is bordered on the north and west sides by sidewalks along vehicular streets. A pedestrian-only plaza area at 11<sup>th</sup> Street exists on the east side of the building between the OPO, the Annex, and the IRS Building. On the south side of the building at C Street, there is a pedestrian plaza area between the OPO and the service drive. Sidewalks along the surrounding blocks connect the OPO to downtown.

The signalized intersections adjacent to the OPO have pedestrian crossing facilities that include crosswalks and timed pedestrian signals. While accessible curb ramps exist at each of the intersections adjacent to the OPO, some of the intersections only have a ramp on one side of the intersection or only one ramp that meets accessibility requirements. None of the intersections have truncated dome pavers (the bumpy surface used on walkways and curb ramps to warn the visually impaired of abrupt grade changes and hazardous vehicular areas), which are installed in the pavement as an underfoot detectable warning to demarcate the boundary between the sidewalk and the street at an intersection.

There are three public pedestrian entrances into the OPO: one on the Pennsylvania Avenue side, one on the south side in the C Street plaza, and one on the east side. The entrances on the south and east sides are accessible. There is also an entrance on the west side of the OPO that is limited to employee access. The Annex can be reached via the C Street plaza; however, it is not currently open to the public. The 11<sup>th</sup> Street plaza serves as the handicap accessible entrance on the east side of the OPO Building. The entry from the Annex to the IRS Building arcade at 10<sup>th</sup> Street is currently closed.

The OPO, located in downtown DC, is within walking distance to many attractions and destinations. The National Mall, the Smithsonian's National Museum of American History and the National Museum of Natural History, Freedom Plaza, the National Theater, the Warner Theater, Ford's Theater, the Pennsylvania National Historic Site, and a number of federal office buildings are all within one quarter mile of the OPO. Additional museums, memorials, shops and restaurants are within a one-half mile radius of the OPO including the White House, the Washington Monument grounds, the National Portrait Gallery, and the Verizon Center.

The 2012 Old Post Office Redevelopment Transportation Study documented pedestrian activity in the vicinity of the OPO (see Table 3-7). These pedestrian counts are generally

high due to the site's central location close to both office buildings and tourist destinations. Pedestrian volumes around the site are the highest during the morning and afternoon rush hours, when commuters arrive and depart from work. The site's proximity to tourist destinations that are open during business hours also contributes to the higher number of pedestrians during the AM and PM rush hours. Pedestrian volumes remain high on Saturdays as residents and visitors frequent the destinations at and around the OPO. The proximity to the Federal Triangle Metrorail station also contributes to the pedestrian activity around the site, particularly on 12<sup>th</sup> Street, where the entrance is located. Public transportation is discussed below in further detail in Section 3.11.8.

Approximately 11 accidents involving pedestrians occurred at the intersections of Pennsylvania Avenue with 10<sup>th</sup>, 11<sup>th</sup>, and 12<sup>th</sup> Streets and at the intersections of Constitution Avenue with 10<sup>th</sup> Street and the 12<sup>th</sup> Street Expressway between 2008 and 2011 (GSA 2012).

Bicycle access to the site is facilitated by the dedicated bicycle lanes in the center of Pennsylvania Avenue. These lanes run from 3<sup>rd</sup> Street to 15<sup>th</sup> Street. Bicycle access to downtown on surrounding streets is provided by some additional bicycle lanes to the north of the site, trails along the National Mall to the south of the site, and some signed on-street bicycle routes.

Peak Hour Pedestrian Volumes				
Intersection	Crosswalk Leg	AM	PM	Saturday
Pennsylvania Avenue, NW @ 12 <sup>th</sup> Street, NW	North	319	481	339
	South	301	492	474
	East	166	277	231
	West	263	500	395
Pennsylvania Avenue, NW @ 11 <sup>th</sup> Street, NW	North	400	752	370
	South	460	514	232
	East	142	198	63
	West	95	188	157
Pennsylvania Avenue, NW @ 10 <sup>th</sup> Street, NW	North	427	645	416
	South	189	391	333
	East	133	264	213
	West	125	308	165
Constitution Avenue, NW @ 12 <sup>th</sup> Street, NW	North	67	215	299
	South	56	360	785
	East	56	337	371
	West	122	639	479
Constitution Avenue, NW @ 10 <sup>th</sup> Street, NW	North	56	205	600
	South	11	417	776
	East	54	265	397
	West	3	4	19

**Table 3-7: Peak Hour Pedestrian Volumes***Source: AECOM 2012*

There is a bicycle rental facility at the OPO site located in the C Street plaza. Capital Bikeshare stations are located on 10<sup>th</sup> Street between Pennsylvania and Constitution Avenues, at the intersection of 10<sup>th</sup> and E Streets, and in front of the Ronald Reagan Building and International Trade Center on 14<sup>th</sup> Street. Capital Bikeshare is a bicycle sharing system with over 1,670 bicycles and 175 stations throughout the District of Columbia, Arlington, VA, and Alexandria, VA. One bike rack is located on the site in the 11<sup>th</sup> Street plaza.

### **3.11.6 How Would Pedestrian and Bicycle Circulation be Impacted by the Redevelopment?**

#### Action Alternative

The public entrance to the OPO Building on Pennsylvania Avenue would be retained. The current employee-only entrance on 12<sup>th</sup> Street would be opened to the public.

From the south side of the building, the Action Alternative would remove the existing glass and steel structure that provides accessibility to OPO. The bike rental kiosk would also be removed. The C Street plaza would be redesigned to provide better access to the OPO. The plaza would feature an accessible ramp for the south entrance and for the Clock Tower.

It is not anticipated that the redevelopment of the OPO would result in a substantial change to the volume of pedestrian activity in the vicinity of the OPO. The existing sidewalks and crosswalks would be able to accommodate the number of pedestrians in the area. Pedestrians would continue to include commuters and tourists, in addition to those visiting the proposed hotel, restaurants, and other facilities at the OPO.

The Action Alternative would include the installation of a driveway at the historic L'Enfant 11<sup>th</sup> street right of way after the area is transferred by NPS to GSA. This change would result in a signalized pedestrian crosswalk at the

south side of the 11<sup>th</sup> Street and Pennsylvania Avenue intersection. The plaza currently south of the intersection at Pennsylvania Avenue and 11<sup>th</sup> Street would be replaced with the 11<sup>th</sup> street driveway; sidewalks would be installed along the driveway to provide pedestrian access to the east side entrances and Annex. On the east side of the Old Post Office two entrances would be open, one providing accessible access to the ground floor and the other at first floor. The first floor entrance, which is currently closed, would be reopened to the public and serve as the primary entrance for hotel guests.

The 11th Street driveway would interrupt the existing sidewalk along Pennsylvania Avenue, creating a pedestrian-vehicle conflict point. The new intersection would include walk signals to minimize potential safety concerns. Additionally, the pedestrian crosswalk would be differentiated with paving to distinguish it from vehicular drive. The intersection would also be fully accessible. The intersection at Pennsylvania Avenue at 11<sup>th</sup> Street would allow for full movement of vehicles: right and left turns, as well as through traffic. A right-in, right-out only movement option was also analyzed in the transportation study. This option resulted in almost identical pedestrian circulation and pedestrian safety impacts as the full movement option. Given the limited number of vehicle trips in and out of the driveway (147 trips in and 112 trips out of the site during the AM peak period; 80 trips in and 96 trips out of the site during the PM peak period; and 72 trips in and 54 trips out

of the site during the Saturday peak period), it is anticipated that pedestrian vehicle conflicts would be minimal.

The crosswalks at the intersection of 11<sup>th</sup> Street and Pennsylvania would be improved as part of the intersection reconfiguration. The preferred selected developer would seek to relocate the bus stop on Pennsylvania Avenue directly in front of the main OPO Building entrance further east, closer to 10<sup>th</sup> Street. This change would provide bus riders with better access to crosswalks across Pennsylvania Avenue and 10<sup>th</sup> Street.

The current pedestrian plaza between IRS and OPO Buildings would be redesigned as a two-lane vehicular access point for the hotel with a driveway and drop-off area. The change from a pedestrian-only zone would remove visitor amenities such as shade trees and benches. The changes to the plaza area would also adjust pedestrian circulation patterns, restricting pedestrian circulation on the eastern side of OPO to sidewalks along the driveway.

In the C Street plaza area, the physical improvements to establish a primary pedestrian entrance from the National Mall would remove and replace the existing plaza. The Action alternative would remove the tables and chairs, tree boxes, and existing bicycle rental facility at the site, and install new moveable, non-fixed outdoor seating areas, furnishings, and new trees would be installed. The replacement of the glass and steel structure with more

open access to the OPO, as well as integrating a ramp for accessibility into the plaza design would enable a seamless entry, resulting in enhanced circulation. Furthermore, this entrance would enhance the accessibility to the Clock Tower for the public. The mid-block crosswalk at the C Street plaza across 12<sup>th</sup> Street would be improved to a wider ramp for accessibility.

The Action Alternative would remove the bicycle racks that are currently located in the plaza area at Pennsylvania Avenue at 11<sup>th</sup> Street. Instead, the redevelopment of the OPO would install approximately 25 bicycle parking spaces within the parking garage for employees. The bicycle racks nearest to the OPO site, located on 11<sup>th</sup> and 12<sup>th</sup> Streets, north of Pennsylvania Avenue, would remain available for use. The three Capital Bikeshare stations within two blocks of the OPO site would continue to operate.

The Action Alternative would allow entry to the Annex from 10<sup>th</sup> Street via the IRS Building arcade. This access point would connect the Annex to 10<sup>th</sup> Street, reinstating this entry.

The Action Alternative would remove the existing security screening requirements and facilities. The public would be able to freely enter and exit the OPO Building.

The *Monumental Core Framework Plan* identifies several transportation strategies related to pedestrians:

- Restore historic squares, streets, and original rights-of-way to reclaim streets and reservations that have been disrupted or closed.
- Reduce the impact of transportation infrastructure to restore the grid of streets and avenues, promote continuity of pedestrian access, and contribute to a sustainable urban environment.
- Eliminate visual obstructions and restore corridors to improve primary and secondary physical connections. In locations where historic axes and public spaces have been disrupted by barriers... these unfriendly insertions should be redeveloped or redesigned in a way that supports the continuity of the urban fabric.

Due to the presence of existing buildings and infrastructure, the proposed redevelopment of the OPO would not restore original streets and reservations that have been closed. The continuity of pedestrian access to the OPO near C Street would be enhanced due to the replacement of the current accessible entrance to the building, while the replacement of an existing continuous sidewalk and pedestrian plaza with a driveway and interrupted sidewalk would reduce the continuity of pedestrian access. However, the driveway and sidewalk would still provide pedestrian connections to the OPO Building and along Pennsylvania Avenue. The outdoor



dining area proposed on the Pennsylvania Avenue side of the OPO would reduce space available for pedestrian movement around the building. However, the size and location of the proposed outdoor dining areas have been carefully placed to allow for unobstructed pedestrian movement along sidewalks on Pennsylvania Avenue, around the Benjamin Franklin statue, and to the main entrance of the OPO. The primary sidewalk movement east and west along Pennsylvania Avenue would remain unobstructed.

As a result of the new curb cut at Pennsylvania Avenue at 11<sup>th</sup> Street, additional outdoor dining areas on Pennsylvania Avenue, the removal of the pedestrian plaza between IRS and OPO, and the removal of the bicycle rental kiosk, there would be minor adverse impacts on pedestrian circulation and bicycle use. The curb cut and additional outdoor dining would only occur after NPS transfers jurisdiction of the area to GSA. There would be beneficial impacts due to the improved accessibility, crosswalk improvements, additional bicycle parking, the removal of security screening requirements, and the availability of all the OPO entrances to the public. Beneficial impacts on pedestrian circulation would also occur due to the facilitated accessible public entrance to the Clock Tower.

#### No Action Alternative

Under the No Action Alternative, improvements to the OPO Building and site would not be undertaken. Thus, impacts to pedestrian circulation would be negligible.

### 3.11.7 What Measures Would Be Undertaken to Reduce Impacts to Pedestrian and Bicycle Circulation?

The introduction of a curb cut along Pennsylvania Avenue at 11<sup>th</sup> Street would create a new pedestrian/vehicle conflict point. After NPS transfers this area to GSA, GSA and the preferred selected developer would:

- Design the intersection with DDOT standards and fully-accessible ramps.
- Work with DDOT to design the intersection and curb cut to provide for the safe and efficient movement of vehicles and pedestrians at the 11th Street driveway to the Old Post Office.
- Modify the traffic signal at 11<sup>th</sup> Street, NW and Pennsylvania Avenue to include pedestrian signal heads and Audible Pedestrian Signals (APS) for the south leg.
- Explore the possibility of including bicycle parking at key locations along the perimeter of the Old Post Office to align with the *District of Columbia Pedestrian Master Plan* goal to provide bicycle parking/storage facilities.
- Include covered bicycle storage as well as shower rooms inside the building.

### 3.11.8 What Public Transit Systems Currently Service the Old Post Office?

Numerous transit services are available within the vicinity of the OPO. The Washington Metropolitan Area Transit Authority (WMATA) provides immediate access to its Blue and Orange Metrorail lines via the Federal Triangle station, located on the west side of 12<sup>th</sup> Street, between Pennsylvania Avenue and Constitution Avenue. The Metro Center station is also located three blocks to the north at the intersection of 12<sup>th</sup> Street and G Street, and provides immediate access to the Blue, Orange, and Red metro lines, with connectivity to the Yellow and Green lines. To the west, the Archives-Navy Memorial station is located at the intersection of Pennsylvania Avenue and 7<sup>th</sup> Street, with connectivity to the Yellow and Green lines. The Federal Triangle Metrorail station has an estimated daily ridership of 9,879, while the Metro Center Metrorail station has an estimated daily ridership of 28,802 and the Archives-Navy Memorial station has an estimated daily ridership of 9,496 (WMATA 2012). The Old Post Office Clock Tower visitation has been fairly constant for the last 25 years at roughly 250,000 a year and it is not anticipated to change in the coming years (NPS 2013).

WMATA and the Maryland Transit Administration (MTA) combine to provide many local and commuter access opportunities to the project area (see Figure 3-16 ). 25 WMATA Metrobus lines make stops within the immediate

vicinity of the project, providing local access to the site. The bus routes accommodate a range of riders, with 14,687 average weekday riders on the 16<sup>th</sup> Street (S24) line and 515 riders on the Glover Park-Federal Triangle (D1) line.

MTA operates seven commuter bus lines making stops within the immediate project vicinity, providing regional/commuter access to the site.

Of the visitors to the OPO, including employees at the site, it is estimated that many use transit to reach the site due to the limited amount of available parking.



**Figure 3-16: Map Illustrating Available Transit Options in the Vicinity of the Project Site**  
 Source: DDOT

WMATA Metrobus Lines Making Stops in Project Vicinity	
• Pennsylvania Avenue Line (Routes 32,36)	• Forth Totten-Petworth Line (64)
• Pennsylvania Avenue Limited Line (39)	• Benning Road Line (X1)
• Glover Park-Federal Triangle Line (D1)	• 16 <sup>th</sup> Street Line (S2, S4)
• Wisconsin Avenue Line (37)	• Naylor Road Line (34)
• Oxon Hill-Fort Washington Line (P17,P18,P19)	• Columbia Pike-Federal Triangle Line (16F)
• Bock Road Line (W13, W14)	• 14 <sup>th</sup> Street Line (54)
• Lincolnia-North Fairlington Line (7Y)	• Martin Luther King Jr. Highway Line (A11)
• Ronald Reagan Washington National Airport-Pentagon-DC Line (13G)	• Anacostia-Congress Heights Line (A42, A48)
• Massachusetts Avenue Line (N3)	• Anacostia-Eckington Line (P6)
• Takoma-Petworth Line (63)	

**Table 3-8: WMATA Metrobus Lines Making Stops In Immediate Vicinity of the OPO**

Source: WMATA

Commuter Bus Lines Making Stops in Immediate Project Vicinity	
• La Plata/Waldorf to Washington, DC (901)	• St. Leonard/Prince Frederick to Washington, DC (902)
• North Beach/Pindell to Washington, DC (904)	• California/Charlotte Hall/Waldorf to Washington, DC (905)
• Waldorf and Accokeek to Washington, DC (906)	• California/Charlotte Hall to Washington, DC (909)
• Kent Island/Annapolis/ Washington, DC (922)	

**Table 3-9: Commuter Bus Lines Making Stops in Immediate Vicinity of the OPO**

Source: WMATA

### 3.11.9 How Would Public Transportation Systems be Affected by the Redevelopment?

#### Action Alternative

The Action Alternative would attract numerous people to the OPO, including employees; guests and patrons of the hotel, restaurants, and other amenities; and tourists and members of the public visiting the tower. Because the parking at the site is limited (although there would be an increase of up to 150 parking spaces at the OPO), it is anticipated that most of these people would arrive via transit, similar to the use patterns of existing employees at the OPO and current visitors. However, the visits to the hotel would occur at more off-peak and weekend hours, as opposed to the current office land use with employees whose commutes occur primarily at the AM and PM peak hours. On the weekend and off-peak transit trips are easily accommodated by the available capacity of the transit system (GSA 2012).

The preferred selected developer would seek to relocate the bus stop on Pennsylvania Avenue directly in front of the main OPO Building entrance further east, closer to 10<sup>th</sup> Street. Over the long-term it is anticipated that the relocation of the bus stops would reduce conflicts between pedestrians, vehicles and busses and would have an overall beneficial impact.

No Action Alternative

Under the No Action Alternative, there would be no redevelopment of the OPO, which would therefore not alter the existing transit system. Therefore, there would be negligible impacts to public transportation systems.

**3.11.10 What Measures Would be Undertaken to Reduce Impacts on Public Transportation Systems?**

In order to mitigate potential impacts due to the relocation of the bus stop on Pennsylvania Avenue, the preferred selected developer will undertake the following mitigation measures:

- Work with WMATA's Bus Planning Department and DDOT's transit coordinator to establish the feasibility of relocating or consolidating the affected bus stops, which should be appropriately located.
- Include necessary bus stop amenities.
- Coordinate with WMATA and DDOT on the relocation of any existing bus stops during the construction phase. The preferred selected developer will contact each agency at least two weeks before the start of the actual construction work to ensure that bus customers are notified of the project before work begins.

### **3.12 PARKING**

#### **3.12.1 What are the Current Parking Conditions at the Old Post Office?**

There is no on-site parking available at the OPO site. On-street parking is available in the immediate vicinity on Constitution Avenue, Pennsylvania Avenue, 6<sup>th</sup> Street, 7<sup>th</sup> Street, 9<sup>th</sup> Street, 10<sup>th</sup> Street, 11<sup>th</sup> Street, and 12<sup>th</sup> Street, although there are restrictions during peak hours in some cases. Several nearby parking garages are located in the vicinity of the site. Figure 3-17 shows the location of the off-street parking garages open to the public, located in proximity to the Old Post Office, and shows their daily rate.

#### **3.12.2 How Would Parking be Affected by the Redevelopment?**

##### Action Alternatives

The Action Alternative would create up to 150 parking spaces in the basement floor of the OPO Annex. The addition of parking spaces in the OPO Annex, along with the redevelopment, is subject to NCPC review and approval (see Section 3.2). These parking spaces would be dedicated for valet parking, although up to five parking spaces would be available for employees.

The redevelopment of the OPO would attract a minor number of additional vehicles to the site. It is anticipated that most visitors will arrive to the site on foot or via Metro or another form of public transportation, including taxis.

However, some additional parking would be needed due to the increase vehicular trips described in Section 3.11. (Note: taxis are included in the vehicular trip calculation, but would not require parking.) Because up to 150 parking spaces would be created on-site, the new parking spaces would address a portion of the needed parking. Should other parking be required, it is anticipated that nearby street parking or parking garages in the vicinity of the OPO would accommodate the additional need. As a result, there would be minor adverse impacts on parking.

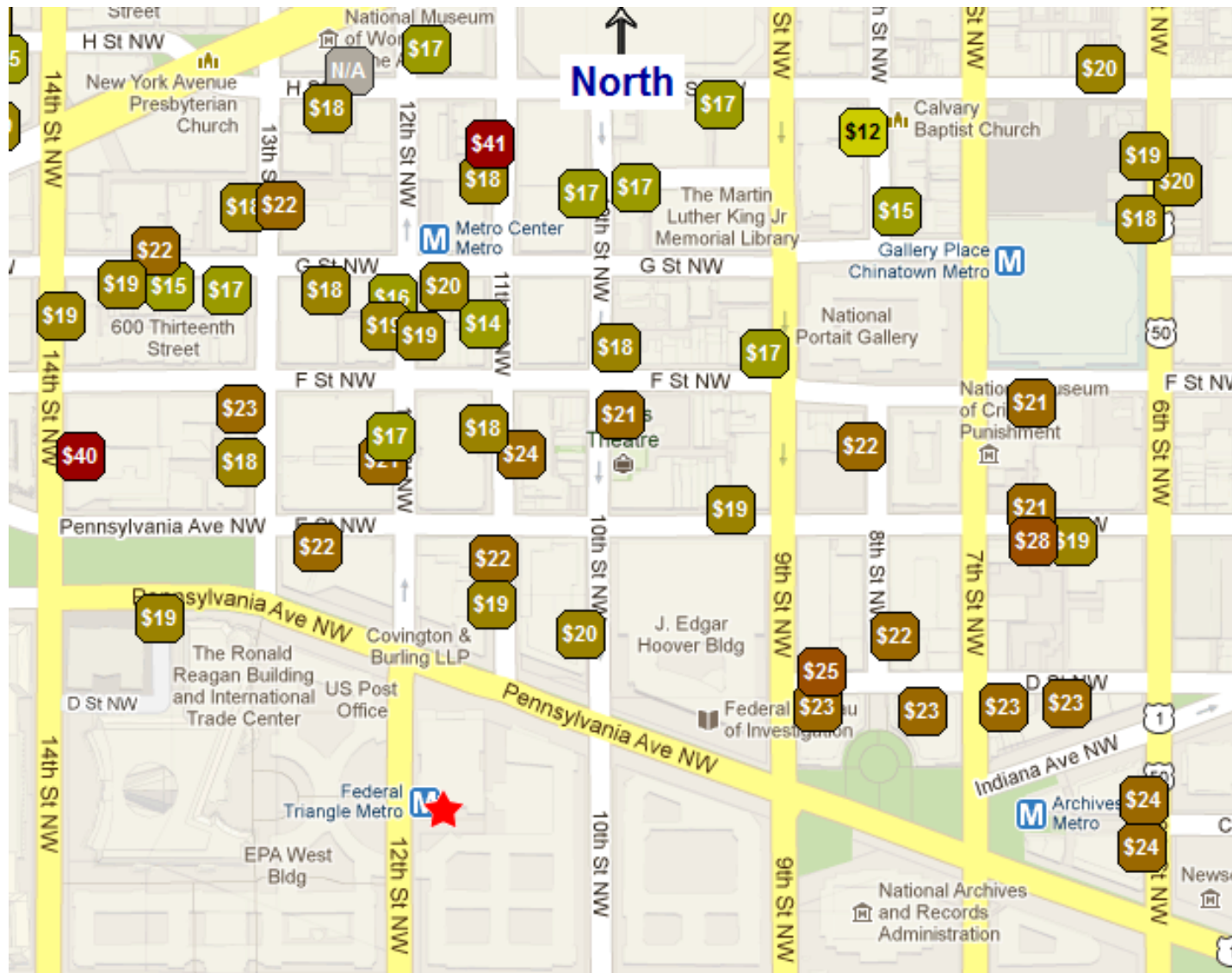
##### No Action Alternative

Under the No Action Alternative, parking in the vicinity of the OPO would not change. As a result, there would be no impacts to parking.

**3.12.3 What Measures Would be Undertaken to****Reduce Impacts to Parking?**

The preferred selected developer would charge a fee to hotel visitors and guests for valet parking. The preferred selected developer would restrict parking to valet parking, and only provide a limited number of parking spaces to employees (up to five). These measures would encourage the use of public transit, and decrease demand on parking.





**Figure 3-17: Existing Parking Garage Map**

Source: DDOT

### 3.13 UTILITIES

#### 3.13.1 Who Provides Utility Service to the OPO?

Electricity to the OPO Building and the Annex is provided by PEPCO. The OPO Building is fed by transformers in underground vaults along the Pennsylvania Avenue side of the building. The Annex is fed by transformers located underneath the service drive from 12<sup>th</sup> Street.

Water service is supplied by DC Water. The pipes enter the OPO Building at two locations, from the east of the building and from the south side of the building underneath the service drive. The Annex water line enters the building beneath the service drive from 12<sup>th</sup> Street.

Washington Gas provides natural gas to the OPO Building and the Annex. The gas line enters the OPO Building on its west wall from a main gas line on 12<sup>th</sup> Street. The gas line that feeds the Annex enters the building underneath the service drive from 12<sup>th</sup> Street.

The OPO Building's HVAC and domestic hot water are received from a plant in the Internal Revenue Service Building. The Annex has an independent Trane rooftop HVAC system and individual hot water heaters located at the point of use.

The IRS Building also supplies chilled water used to cool the offices located within the OPO and condenser water for

cooling equipment that supports the food court area. The OPO Building and Annex utilize steam heat and are connected to the GSA central heating plant.

Underground telecommunication lines serve the OPO and adjacent buildings, including the IRS Building. Storm sewer curb inlets to collect stormwater runoff are located on the edges of the site. These inlets connect into the sanitary sewer system.

#### 3.13.2 How Would the Renovations Affect Local Utilities?

##### Action Alternative

Some of the sidewalks and plazas surrounding the OPO Building would be disturbed during construction due to the renovation of the existing plazas on the north, east, and south sides of the OPO Building and the installation of new utilities. A curb cut would be installed on the south side of Pennsylvania Avenue at the 11<sup>th</sup> Street intersection to provide access for guest drop off/pick-up, taxis, valet parking and other vehicles once the NPS has transferred jurisdiction of the area to GSA. This curb cut and driveway would disturb existing lampposts, a traffic signal and signal box, and a storm sewer curb inlet. Traffic signal devices would be added or modified to direct northbound vehicles exiting the OPO at 11<sup>th</sup> Street and Pennsylvania Avenue. This construction-related ground disturbance could impact

utility lines that run underground; however, it is anticipated that ground disturbance would be shallow.

The existing plaza at C Street would be replaced by a new plaza. This construction-related ground disturbance could also impact utility lines that run underground; however, it is anticipated that ground disturbance would be shallow. These renovations could require the disturbance of lampposts currently along 12<sup>th</sup> Street during construction, which would be replaced according to District standards.

The redevelopment of the OPO would separate the HVAC, hot water, chilled water, and condenser water systems from the existing systems housed in the IRS Building and a new high-efficiency mechanical system with high-efficiency boilers would be installed in the Annex basement to serve the OPO and Annex. The OPO would also be disconnected from the GSA central heating plant. The OPO and Annex buildings' mechanical systems would be connected to public utility services. In order to separate the two buildings' systems, utility service to the OPO and the IRS Building would need to be disconnected during certain portions of the work. This would be coordinated with the IRS Building and utility service providers. Interior renovations could also require temporary utilities disconnection within the OPO and the Annex. This would be coordinated with the utility service providers.

Overall, short-term minor impacts to utilities would occur during construction activities and the disconnection from

the IRS Building's systems. In the long-term, beneficial impacts would occur to the storm sewer system due to an increase in stormwater management on the site.

#### No Action Alternative

Under the No Action Alternative, there would be no redevelopment of the OPO, which would therefore not alter the existing utilities. Therefore, there would be negligible impacts to utilities.

#### **3.13.3 What Measures Would be Undertaken to Reduce Impacts to Utilities?**

The preferred selected developer, along with GSA, would coordinate with all utility service providers and the IRS Building prior to and during construction. This includes coordination with PEPCO and Washington Gas to ensure electrical and gas lines remain intact and are safe to work around.

The preferred selected developer, along with GSA, would consult with the DC Fire Marshall to ensure that access to fire hydrants and the building is maintained.

The preferred selected developer would also coordinate with DC Water to determine whether a preconstruction survey is necessary and for potential relocation of storm sewer inlets.

The preferred selected developer would be responsible for ensuring that any new or replacement street lighting would be in accordance with DC standards, and with NPS standards along Pennsylvania Avenue, NW and in conformance with the PADC Plan and related requirements.

Utility work may require disturbance of land along Pennsylvania Avenue (south and north sides) that is under NPS jurisdiction. GSA, along with the preferred selected developer, would coordinate with NPS regarding any necessary permits for utility work that would disturb land that is under NPS jurisdiction, but outside the area to be transferred from NPS to GSA.

### **3.14 ENERGY USE AND SUSTAINABILITY**

#### **3.14.1 What Energy Use and Sustainability Measures are Utilized on the Site?**

Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, was signed in 2009 and directs federal agencies to strengthen their sustainable practices and reduce greenhouse gas emissions. The Executive Order provides targets for reductions in water and energy consumption and diversion of materials.

The OPO Building energy and water consumption supports the building's office and mixed-use retail functions. The Annex is currently vacant and GSA provides minimum heat in the winter for freeze protection and air circulation in the summer to maintain the building.

A major renovation of the Old Post Office Building was conducted in the early 1980s and the Annex was built in the early 1990s. The OPO Building's systems have not been updated since that time and the current systems exceed their life expectancy. As the heating, ventilating, and air conditioning systems in the Old Post Office are outdated, the systems are inefficient and expensive to maintain.

The Old Post Office Building HVAC and domestic hot water are supplied via the IRS Building from the GSA's Central Heating Plant. The IRS Building recently underwent

renovations and modernization, which included updates to the plant. Electricity is supplied to the building by PEPCO. Water and gas lines also connect into the building for supply purposes.

The central portion of the OPO Building is comprised of an atrium called the Cortile that includes a nine-story light court topped by a large skylight. The skylight provides natural day light to the Cortile, reducing artificial lighting requirements. Low-energy, long-life bulbs are used in the OPO Building overhead lighting fixtures. The tenants in the Old Post Office Building participate in a recycling program that accepts all types of paper, plastics, and cans.

Mechanical systems at the Annex building include an independent Trane rooftop environmental conditioning system. Hot water is supplied by individual heaters at point of use. PEPCO supplies the electricity to the Annex building, although currently climate control is not consistently operated within the Annex. These systems are used minimally due to the Annex building's vacant status.

#### **3.14.2 How Would Energy Use and Sustainability be Affected by the Redevelopment?**

##### Action Alternative

The action alternative would alter the energy use at the site as well as increase sustainable practices. The Old Post Office and Annex would be redeveloped from an office

building with retail into a mixed-use luxury hotel. The hotel would introduce new energy-consuming uses such as commercial kitchen energy loads, housekeeping functions, and 24-hour operations to meet guest needs including space conditioning and water heating. The number of people served at the site on a daily basis would also increase. As these types of activities and durations do not occur in office buildings, hotel operations would increase the energy use at the site. The currently vacant Annex building would become utilized space, requiring higher energy loads.

Measures designed to decrease energy use and increase sustainable operations would also be implemented. The renovation would use sustainable design principles established in the LEED certification standards. Energy-efficient interior storm windows would be installed and would help to improve energy efficiency in the OPO Building. The replacement of the Cortile's skylight glass with high-performance glass would also help to improve the energy efficiency of the OPO Building.

Energy use at the Annex could be reduced due to the vegetative elements, or "green roof," that would be installed on the roof of the Annex. Green roofs absorb heat and act as insulators for buildings, reducing energy use. Increased vegetation around structures can also help to moderate interior temperatures thereby reducing heating and cooling loads (EPA 2009).

High-efficiency mechanical systems that would be installed in the Annex basement would improve efficiency at both buildings and eliminate the need for a connection to the systems in the IRS building. These new systems could include high-efficiency boilers, new chillers and mechanical systems, and a Building Management System (BMS). BMS is a computerized system used to coordinate and control the major system functions such as heating, ventilating, and air conditioning or HVAC systems, and lighting systems, which helps to control the overall management of energy usage. The purchase of energy derived from alternative energy sources, as offered by PEPCO, would be explored to reduce the consumption of non-renewable energy resources.

Under the action alternative, hotel operations in the OPO Building and the Annex would require more energy and water resources; however, sustainable practices would be implemented, the buildings' energy efficiency would be increased and, when compared with the amount of resources consumed and the number of people and uses served, the buildings could become more efficiently utilized. Over the long-term, minor to moderate adverse impacts to energy use and sustainability would occur due to the buildings' increase in energy demands. The buildings' increased energy efficiency would also have long-term beneficial impacts on the property as a whole.

No Action Alternative

The energy use and sustainability measures at the site would not change under the No Action Alternative. The rehabilitation of the OPO Building and the Annex would not take place. Building inefficiencies would not be addressed outside of regular maintenance activities; however, building occupancy and energy and water usage would remain at existing levels. Therefore, impacts to energy use and sustainability would be negligible.

### 3.15 CUMULATIVE IMPACTS

#### 3.15.1 What are Cumulative Impacts and Why are They Considered?

The CEQ regulations for implementing NEPA define cumulative impacts as those impacts that result from the incremental impact of the proposed action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. In accordance with these regulations, cumulative impacts are considered within this analysis so that the environmental impacts of the proposed action are not viewed in isolation, but are understood within the context of other ongoing or planned changes.

#### 3.15.2 What Past, Present or Future Projects Could Contribute to Cumulative Impacts?

##### Projects under Construction

###### *National Mall Turf Rehabilitation*

NPS seeks to improve the vegetation and soil on the National Mall by removing and replacing the existing soil and irrigation system in portions of the National Mall and installing new curb and gutter profiles around turf panels. Phase I of the project (the area between 3<sup>rd</sup> and 7<sup>th</sup> Streets) was completed in 2012. Additional phases are pending.

###### *National Museum of African American History and Culture*

The Smithsonian's National Museum of African American History and Culture (NMAAHC) is under construction on a site at the southwest intersection of Constitution Avenue, NW and 14<sup>th</sup> Street on the National Mall, directly south of the Herbert C. Hoover Building. This new Smithsonian museum will consist of approximately 400,000 sf of space and is the first national museum to be devoted exclusively to the documentation of African American life. The museum is scheduled to open in 2015.

###### *Washington Monument Earthquake Damage Repairs*

The NPS is currently working to repair damage suffered in the 2011 earthquake that affected the Washington Monument, which has since been closed to the public. The repairs are expected to be completed in 2014. Closure of the Washington Monument is believed to have caused the substantial increase seen in public visitation of the Clock Tower.

##### Ongoing Projects

###### *National Mall Plan*

The National Park Service's National Mall and Memorial Parks has a management plan for the National Mall. The OPO is located one block from the National Mall's northern boundary, Constitution Avenue, NW. The National Mall Plan balances the use of parks with the preservation of



their natural and cultural resources over the next 50 years. Ongoing or related projects within the National Mall include the 17<sup>th</sup> Street, NW Levee, the enhancement of Constitution Gardens, and the renovation of the Sylvan Theater.

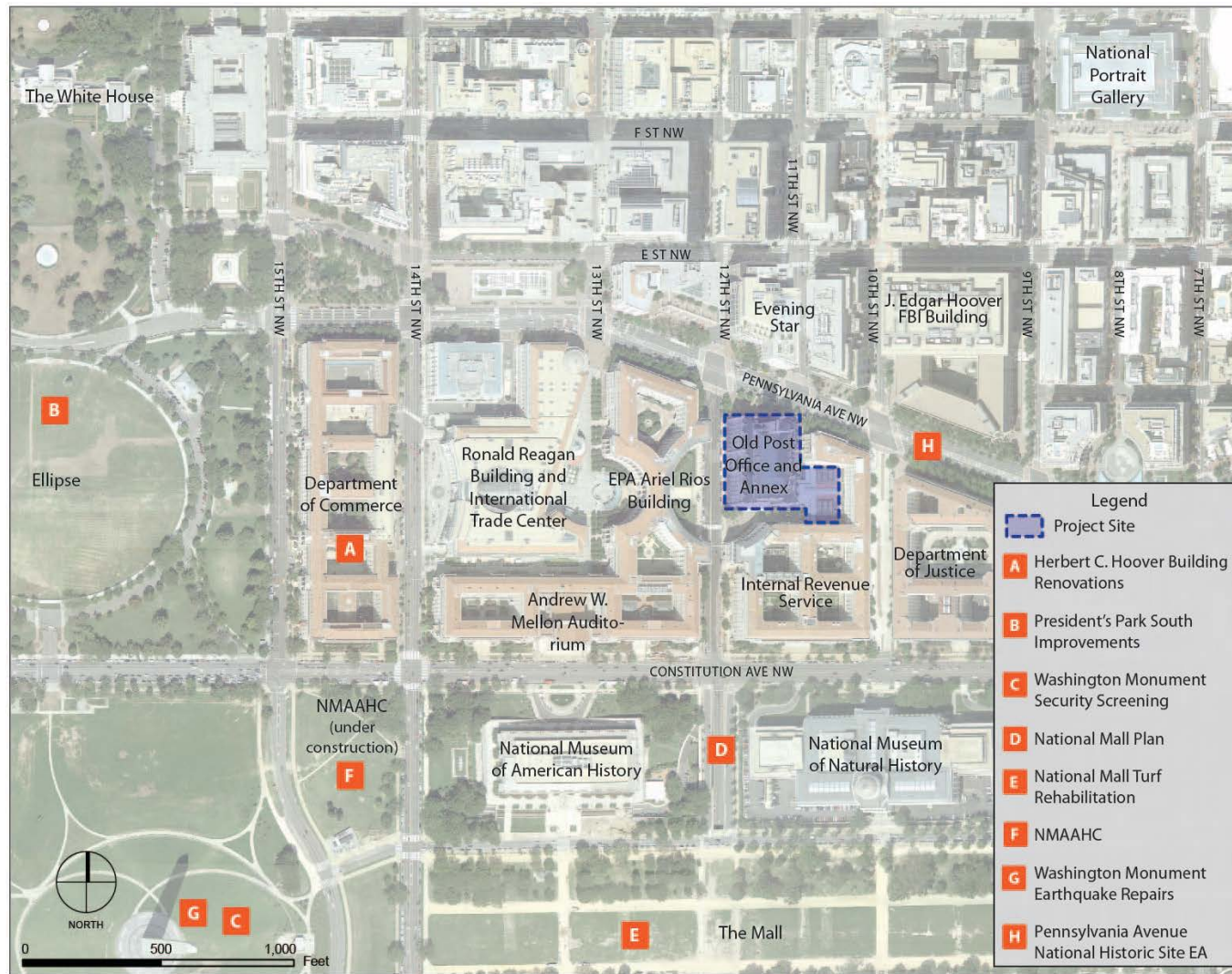
*Perimeter Security Projects within the Nation's Capital*

Numerous perimeter security projects are planned, have been approved, or have been recently completed within Washington, DC. In addition, several rights-of-way have been closed for security purposes. These security improvements are widespread, including those to the south on the National Mall, to the east around the U.S. Capitol Building, and to the west around the White House. Temporary perimeter security measures have been installed around buildings within the Federal Triangle, and permanent security measures are under consideration for several of the buildings, including the Herbert C. Hoover Building and the National Archives. South of the OPO, along the National Mall, permanent perimeter security has been

installed or approved for installation at the majority of the Smithsonian museums, including NMAI, NASM, the Hirshhorn Museum, the Smithsonian Castle, the NMNH, and the NMAH. Permanent perimeter security has also been installed at the White House.

*Herbert C. Hoover Building Renovation and Perimeter Security Improvements*

The Herbert C. Hoover Building, which houses the Department of Commerce, the National Aquarium, and the NPS' White House Visitor Center, is currently undergoing interior renovations and exterior improvements. As part of the renovation, the National Aquarium entrance would be relocated to Constitution Avenue, and accessible entrance ramps and perimeter security would be added. Perimeter security elements are proposed in the building yard and public space. GSA is currently in the process of completing an EA and the Section 106 agreement for this project.



**Figure 3-18: Map of Cumulative Projects in Vicinity of OPO\***

Source: AECOM

Note: The Perimeter Security Projects within the Nation's Capital are located throughout the vicinity, and are therefore not specifically identified on this map.

### Planned Projects

#### *National Park Service Pennsylvania Avenue Plan*

The NPS is preparing an EA for the NPS Pennsylvania Avenue Plan, which is expected to be released to the public in 2013-2014. The EA will address how the plan will accomplish creating a vibrant and lively Pennsylvania Avenue, while retaining its character as a grand ceremonial boulevard. It is anticipated that the Pennsylvania Avenue Plan will provide comprehensive and cohesive design guidelines for the Pennsylvania Avenue National Historic Site.

#### *President's Park South Improvements*

Plans are currently under development for President's Park South, the area located south of the White House that is historically known as the Ellipse. The designs will include landscape and infrastructure changes to the area that respond to the proposed street closures and re-design of security elements to preserve the iconic historic landscape that is the White House and its environs.

#### *Washington Monument Security Screening*

NPS proposes to replace and improve the existing visitor screening facility at the base of the Washington Monument, replacing the existing temporary facility and improve the overall security of the Monument in a manner that

maintains and preserves the visitor experience and cultural landscape of the Washington Monument Grounds.

#### *Federal Triangle Perimeter Security Planning*

GSA is currently in the process of developing a conceptual plan for perimeter security in the Federal Triangle, specifically for the Internal Revenue Service building, EPA East and West Buildings, Ariel Rios, and Department of Justice. This planning is in its early stages and the full implication of what will eventually be proposed and implemented is not fully known. Additionally, there is no funding available for advancing the plan beyond conceptual design. The actual implementation of permanent perimeter security for these buildings is unknown. The objectives of the Federal Triangle Perimeter Security Plan are to remove the temporary barriers that are located throughout the Federal Triangle and provide for security that is integrated into the urban design of the Federal Triangle, in a manner that enhances the public realm.

### **3.15.3 What Cumulative Impacts Would Occur from the Proposed Action?**

#### Land Use and Planning Policies

The redevelopment of the OPO has the potential to generate cumulative impacts to planning policies, when considered together with other planned or ongoing projects. The redevelopment of the OPO is largely

consistent with the *Comprehensive Plan for the National Capital: Federal Elements and District Elements*; the *Monumental Core Framework Plan*; the *District of Columbia Bicycle Master Plan*, and the *DDOT Design and Engineering Manual*. The redevelopment would support these plans' policies, such as the activation of the Pennsylvania Avenue corridor, the call for new hotel space at the site, and the use of green building features. The introduction of a curb cut at Pennsylvania Avenue and 11<sup>th</sup> Street for a driveway entrance would not be consistent with the *District Elements* although it might not be inconsistent with the PADC Pennsylvania Avenue Plan and related requirements. Overall, the Action Alternative would result in minor adverse impacts and beneficial impacts on local plans and policies due to the proposed redevelopment of the site.

The Herbert C. Hoover Building, National Mall Plan implementation, NMAAHC, perimeter security projects within DC, the President's Park South improvements, and the NPS Pennsylvania Avenue Plan are all projects that have or are anticipated to go through the public review process, which will evaluate their compliance with planning policies. As a result, it is anticipated that these projects would largely conform to existing plans and policies.

The earthquake repairs to the Washington Monument have closed the structure, thereby currently eliminating the public's ability to see a panoramic view of the monumental

core from its top, placing more importance on the remaining panoramic view in the monumental core, the Clock Tower. NPS has recorded an increase in public visitation of the Clock Tower from 2011 to 2012 (approximately 50,000 visitors). Although the Clock Tower would be closed during renovation of the OPO, with the proposed reopening of the Washington Monument in 2014, the public would continue to have access to a panoramic view of the monumental core. Increased public demand would consequently be placed on the Washington Monument; however this would only be for a short time as the duration of the OPO renovation is approximately two years.

Cumulative impacts to land use would be expected to be minor as NPS continues to explore transfers of jurisdiction of portions of the Pennsylvania Avenue National Historic Site. However, it is expected that with any transfer; protective covenants would be in place.

Overall there are expected minor cumulative adverse impacts to land use, and minor and beneficial cumulative impacts on planning policies.

### Public Space

The proposed redevelopment of the OPO has the potential to create cumulative impacts on public space. These changes when considered together with the perimeter security projects completed or planned within the central portion of the District of Columbia and the Herbert C. Hoover Building Renovation and Perimeter Security Improvements, would adversely impact public space by interrupting the continuity of area sidewalks on Pennsylvania Avenue and impeding into an existing right of way of the C Street plaza.

The NPS Pennsylvania Avenue Plan would likely beneficially impact public space along Pennsylvania Avenue, as the goals of that plan are to provide for more pedestrian amenities and enhancement of the area. The OPO redevelopment is consistent with the goals of the NPS Pennsylvania Avenue Plan, which is still in the development stage, as it would help enliven Pennsylvania Avenue. Furthermore, GSA, with the preferred selected developer would be required to coordinate any changes to streetscape elements and sidewalks with the NPS. These changes would also need to conform to the PADC Pennsylvania Avenue Plan and related requirements. This coordination would help ensure that any proposed changes at the OPO would be accomplished in accordance with NPS goals for Pennsylvania Avenue.

As a result, there would be minor cumulative impacts to public space.

### Historic Resources

The redevelopment of the OPO has the potential to generate cumulative impacts to historic resources, when considered together with perimeter security projects that have been recently completed or are planned within nearby portions of the District of Columbia. The relationships between the rights-of-way, building yards, and reservations are important features of the L'Enfant Plan. Perimeter security placed between the sidewalk and the vehicular right of way at the Herbert C. Hoover Building and other facilities in the vicinity of Federal Triangle and Pennsylvania Avenue could physically interrupt these relationships. Cumulatively, the proposed and ongoing project could result in adverse impacts to the L'Enfant Plan and McMillan Plans.

The placement of perimeter security and the NPS Pennsylvania Avenue Plan could also change the existing continuity of the Pennsylvania Avenue National Historic Site and the Federal Triangle Historic District. The perimeter security improvements could also result in cumulative impacts to the setting of the Ariel Rios Building, depending upon the location of the improvements. Cumulatively, it can be expected that these projects would have minor to moderate impacts to historic resources. As future projects would be required to comply with Section

106 of the NHPA, Shipstead-Luce Act, the PADCC Pennsylvania Avenue Plan and requirements, and policies and plans set forth by NCPC, it is anticipated that through these design review processes the impacts from these projects would be mitigated. However, the OPO redevelopment through the Section 106 process has been determined to not result in adverse effects, therefore the proposed action would not cumulatively add to impacts to historic resources.

#### Archeological Resources

The cumulative projects would not affect archaeological resources within the study area. Therefore, there would be negligible cumulative impact on archaeological resources.

#### Visual Resources

The redevelopment of the OPO, when considered together with other cumulative projects within the area of visual influence, has the potential to adversely impact visual resources. The limited removal of trees, installation of a curb cut and entrance features, and the creation of outdoor seating areas would result in minor impacts on visual resources along Pennsylvania Avenue and 12<sup>th</sup> Street, and minor-to-moderate impacts to views along 11<sup>th</sup> Street. Perimeter security improvements in the vicinity of the OPO could introduce new features to the view corridors, which could also adversely impact visual resources. Similarly, the NPS Pennsylvania Avenue Plan could also introduce

changes to the view corridor. As future projects would be required to comply with Section 106 of the NHPA, Shipstead-Luce Act, the PADCC Pennsylvania Avenue Plan and requirements, and policies and plans set forth by NCPC, it is anticipated that through these design review processes the impacts from these projects would be mitigated. Cumulatively, there would be minor impacts on visual resources along Pennsylvania Avenue and 12<sup>th</sup> Street, and minor-to-moderate views along 11<sup>th</sup> Street.

#### Vegetation

Proposed and ongoing projects are expected to have negligible impacts to vegetation within the study area. Therefore, there would be negligible cumulative impacts on vegetation.

#### Stormwater Management

With new policies in place to enhance stormwater management in the District, it is expected that overall proposed and ongoing projects would improve stormwater management. Cumulatively, beneficial impacts may occur to stormwater management within the study area.

#### Floodplains

The redevelopment of the OPO has the potential to generate cumulative impacts to floodplains, when considered together with perimeter security projects that have been completed or are planned within the District of

Columbia, as well as the Herbert C. Hoover Building renovation and perimeter security improvements, and the construction and operation of NMAAHC. The redevelopment and mix of uses of the OPO would result in minor impacts on floodplains. Perimeter security improvements in the vicinity of the OPO, such as those for the Federal Triangle and the National Mall, the Herbert C. Hoover Building renovation and perimeter security improvements, and the NMAAHC would be installed and/or constructed within the same floodplain zone as the OPO. Although these projects would take place within the floodplain, they would not result in the loss of the beneficial or natural values of the floodplain. GSA and Smithsonian Institution, as the building and construction agents for the Herbert C. Hoover Building renovation and NMAAHC, respectively, would be required to adhere to appropriate building practices for construction in a floodplain. As a result, there would be minor cumulative impacts on floodplains.

#### Air Quality

The redevelopment of the OPO would be within the *de minimis* threshold established by the EPA. Therefore, there would be negligible cumulative impacts on air quality.

#### Vehicular Traffic

No cumulative projects are located within the vehicular traffic study area of the Old Post Office Redevelopment. Although there are other projects within downtown Washington currently under development, these locations were determined, in consultation with DDOT, to affect intersections outside the OPO study area, and it was determined that these developments would not have perceptible effects on study intersections. Therefore, there would be negligible cumulative impact.

#### Pedestrian and Bicycle Circulation

The redevelopment of the OPO has the potential to generate cumulative impacts to pedestrian circulation, when considered together with perimeter security projects that have been completed or are planned within the District of Columbia. The introduction of a curb cut on Pennsylvania Avenue at 11<sup>th</sup> Street, the replacement of the pedestrian-oriented Annex plaza with a driveway, and the placement of outdoor restaurant seating along Pennsylvania Avenue would result in minor impacts on pedestrian circulation. Beneficial impacts would occur as a result of improved accessibility, crosswalk improvements, additional bicycle parking, the removal of security screening requirements, the relocation of a bus stop, and the availability of all the OPO entrances to the public. Perimeter security improvements in the vicinity of the OPO, such as those for the Federal Triangle and the National

Mall, could be installed outside of the building yards and within the sidewalks. These elements would potentially hinder pedestrian flow, although mitigation measures would reduce impacts. Potential changes to pedestrian flow along Pennsylvania Avenue could occur as part of the NPS Pennsylvania Avenue Plan. Given the goals of the NPS Pennsylvania Avenue Plan, it is anticipated that the pedestrian experience and pedestrian circulation would improve with the implementation of the Plan. As a result, there would be minor cumulative impacts on pedestrian circulation.

#### Utilities

The redevelopment of the OPO has the potential to generate cumulative impacts to utilities, when considered together with perimeter security projects that have been completed or are planned within the District of Columbia, as well as the Herbert C. Hoover Building renovation and perimeter security improvements, and the construction of NMAAHC. The construction activities and disconnection from the IRS Building's systems would result in short-term minor adverse impacts to utilities, while long-term beneficial impacts would be beneficial due to an increase in stormwater management on the site. Perimeter security improvements in the vicinity of the OPO, such as those for the Federal Triangle and the National Mall, as well as the

Hoover Building and site improvements and NMAAHC have the potential to disrupt service during construction. The Hoover Building and site improvements and NMAAHC would improve stormwater management at the sites. When combined with the cumulative projects, there would be short-term minor adverse impacts and long-term beneficial impacts on utilities.

#### Energy Use and Sustainability

The redevelopment of the OPO has the potential to generate cumulative impacts to energy use and sustainability, when considered together with the Herbert C. Hoover Building renovation and perimeter security improvements and the construction of NMAAHC. The redevelopment of the Old Post Office would result in minor to moderate adverse impacts to energy use and sustainability would occur due to the buildings' increase in energy demand and beneficial impacts on the property as a whole due to the buildings' increased energy efficiency. The Herbert Hoover Building rehabilitation would also improve energy efficiency, resulting in beneficial impacts. NMAAHC would meet LEED Gold standards, and therefore be energy efficient, although it would increase energy use. When combined with the cumulative projects, there would be long-term minor adverse and beneficial impacts on energy use and sustainability.



## **4.0 APPENDIX**

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## 4.1 SOURCES

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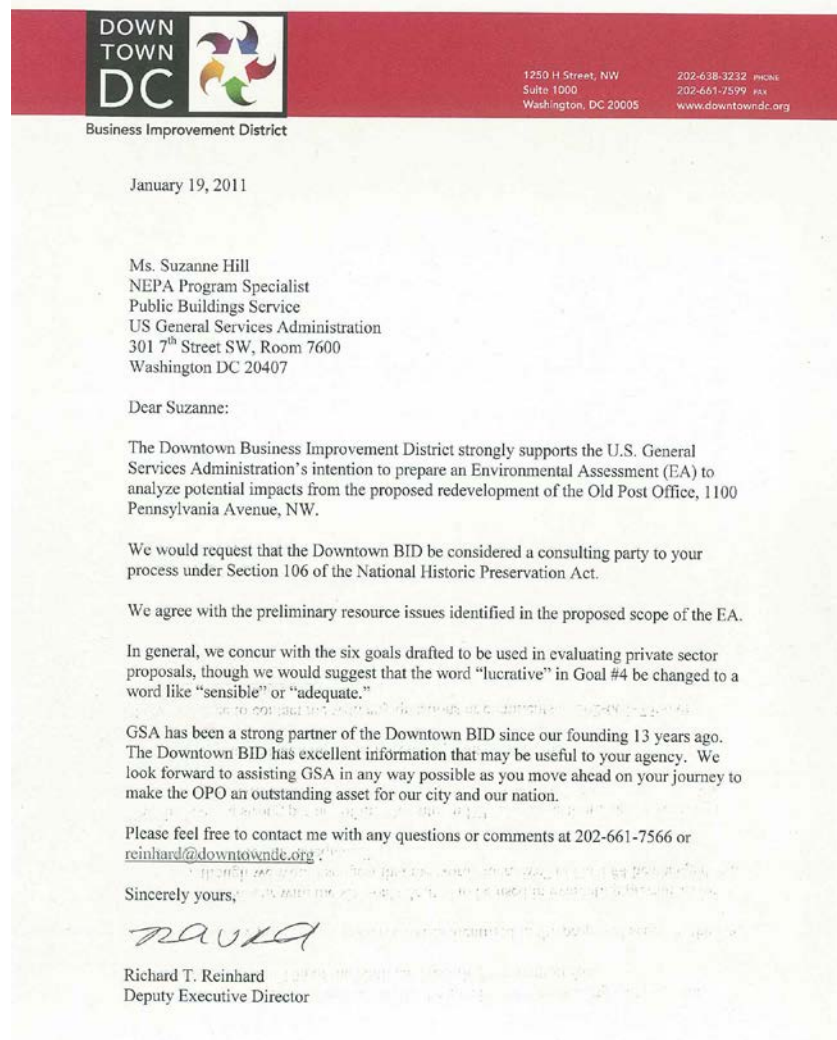
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## 4.4 SCOPING COMMENTS RECEIVED



January 19, 2011

Mr. Gary Porter  
Regional Historic Preservation Office  
National Capital Region  
U.S. General Services Administration  
7<sup>th</sup> and D Street, SW, Room 2020  
Washington, D.C. 20407

Ms. Suzanne Hill  
NEPA Program Specialist  
National Capital Region  
U.S. General Services Administration  
301 7<sup>th</sup> Street, SW, Room 7600  
Washington, D.C. 20407

RE: *Proposed Lease and Redevelopment of the Old Post Office Building  
Washington, D.C.*

Dear Mr. Porter and Ms. Hill:

On June 25, 2009, the Advisory Council on Historic Preservation (ACHP) advised the U.S. General Services Administration (GSA) that we would participate in consultation to develop a programmatic agreement (PA) for the subject undertaking, a long-term lease of the property for redevelopment. The undertaking is being proposed in compliance with the Old Post Office Building Redevelopment Act of 2008 (PL 110-359, HR 5001) and Section 111 of the National Historic Preservation Act (NHPA).

In a letter from Mr. Gary Porter, Regional Historic Preservation Office (RHPO), National Capital Region (NCR), received by our office on January 12, 2011, GSA indicated that they intend to develop an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA), and will be coordinating the public outreach and involvement requirements of the EA with those of Section 106 of the NHPA (Section 106) and our regulations, *Protection of Historic Properties*, 36 CFR § 800.8. On January 4, 2011, we received a similar notification letter from Ms. Julia Hudson, GSA Regional Administrator, NCR.

In accordance with our regulations, we look forward to obtaining information from GSA about the undertaking's Area of Potential Effects (APE), a description of the affected historic properties, a description of the undertaking's effects on historic properties, and an explanation of

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2

why the criteria of adverse effect were found applicable (36 CFR § 800.11(e)). We also request that GSA clarify whether they intend to develop a PA (36 CFR § 800.14) to govern the implementation of the undertaking and resolution of adverse effects.

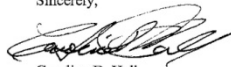
We understand that GSA will distribute the draft EA for public review and comment in the fall/winter of 2011. We request that you provide us with a schedule for Section 106 consultation, so that we may better understand your coordinated public involvement plans, as well as your plans for resolution via the aforementioned PA or a Memorandum of Agreement (MOA) (36 CFR § 800.6(c)). While ACHP's regulations do not specifically require that an agency provide us with an EA, given your coordinated efforts, we also request that GSA send us a digital copy and copies of any comments GSA receives.

As you work to comply with both NEPA and Section 106 in a timely and efficient manner, in accordance with 36 CFR § 800.8(a)(1), it is important that GSA complete a PA or MOA in advance of finalization of the EA decision document, which should acknowledge the completed PA or MOA.

Finally, as the property is a National Historic Landmark, please consider the special requirements for protecting such properties (36 CFR § 800.10).

If you have any questions or require our further assistance, please contact Kirsten Brinker Kulis, GSA Liaison, at 202-606-8517 or via e-mail at [kkulis@achp.gov](mailto:kkulis@achp.gov).

Sincerely,

  
Caroline D. Hall  
Assistant Director  
Office of Federal Agency Programs  
Federal Property Management Section



U.S. Department of Justice

Federal Bureau of Investigation

Washington, D. C. 20535-0001

January 14, 2011

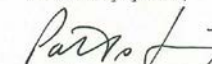
Ms. Susan Hill  
NEPA Program Specialist  
U.S. General Services Administration  
Public Buildings Service  
301 7th Street, SW, Room 7600  
Washington, DC 20407

Dear Ms. Hill:

Thank you for your letter dated January 3, 2011, to Director Mueller, concerning the Environmental Assessment for the redevelopment of the Old Post Office Building. The FBI has no objections to the scope of the Environmental Assessment or the draft goals presented in your letter.

We appreciate the opportunity to provide input on this issue.

Sincerely yours,

  
Patrick G. Findlay, P.E.  
Assistant Director  
Facilities and Logistics  
Services Division

cc: Ms. Cathleen Kronopolus, Regional Commissioner



January 19, 2011

Ms. Suzanne Hill, NEPA Program Specialist  
U.S. General Services Administration, Public Buildings Service  
301 7th Street, SW, Room 7600  
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suzanne.hill@gsa.gov

Dear Ms. Hill

This letter has been prepared in response to a letter from Ms. Cathleen C. Kronopolus, Regional Commissioner, Public Buildings Service, General Services Administration, dated January 3, 2011, letter to Mr. Richard Sarles, General Manager of the Washington Metropolitan Area Transit Authority. The GSA letter requested written comments regarding the scope and the draft goals of a NEPA environmental assessment of a proposed redevelopment of the Old Post Office, located at 1100 Pennsylvania Avenue, NW. WMATA has identified three matters that must be addressed as part of the environmental analysis of future development at this site.

WMATA has bus routes that serve the Federal Triangle on both Pennsylvania Avenue and 12<sup>th</sup> Street, in the vicinity of the Old Post Office; bus routes must not be impacted without prior coordination with WMATA. Bus stops on Pennsylvania Avenue, 12th Street and the 10th Street side of the block that should be upgraded to meet regional standards for function, access and facility. The area around the Old Post Office functions as a bus bridge location during a rail outage; the streetscape along 12th Street should accommodate this potential emergency use. Next, WMATA offers a Smart Benefit program which should be included as part of transportation demand management measures for the site. Finally, an on-site transit information program should also be included in travel mitigation efforts. Mr. Jim Hamre is the point of contact, and he can be reached at (202) 962-2870.

WMATA Metrorail's Blue and Orange Lines are located parallel to and beneath 12 Street, adjacent to the Old Post Office. Construction activities must be coordinated with Mr. Thomas Robinson, PE, of WMATA's Office of Joint Development and Adjacent Construction. Mr. Robinson can be reached at (202) 962-2526. This website provides additional information and requirements:  
[http://www.wmata.com/business/joint\\_development\\_opportunities/adjacent\\_construction\\_information.cfm](http://www.wmata.com/business/joint_development_opportunities/adjacent_construction_information.cfm)

Finally, WMATA is aware of flooding concerns in the Federal Triangle area. I trust that GSA is aware of this matter.

Should you have any questions, please contact me at (202) 962-1745.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Ashe'.

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AGENCY-WIDE  
SHARED SERVICES

DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, D.C. 20224

JAN 19 2011

Cathleen C. Kronopolus  
Regional Commissioner  
Public Buildings Service

Dear Ms. Kronopolus:

Thank you for the opportunity to comment on the GSA environmental assessment (EA) scoping process for the proposed Old Post Office (OPO) redevelopment project. The IRS Headquarters Building located at 1111 Constitution Avenue, NW, Washington, DC, is directly adjacent to the OPO and OPO Annex. Because the IRS building shares critical infrastructure we expect that construction activity related to the project will have the potential to impact IRS operations or its operating environment.

We request that the EA for the OPO redevelopment project consider and address the following aspects of environmental concern:

Impact on existing critical infrastructure to 1111 Constitution Avenue, NW, including electrical, gas, steam, chilled water, and telecommunications. The assessment should address considerations for continuity of service to adjacent facilities, potential service disruptions, and contingency planning;

Currently the Old Post Office (OPO) relies on the IRS to provide chilled water for cooling of the offices located within the OPO facility. Additionally, the IRS provides condenser water for the cooling equipment that supports the food court area. Hot water equipment, located in the IRS facility, but maintained by GSA, also needs to be evaluated in this study. As indicated in the transmittal letter the OPO will more than likely be redeveloped by a private sector concern, therefore, it would be essential that any cooling and heating equipment to support the redeveloped OPO be provided by a new central plant located in or adjacent to the OPO. The EA would most likely need to include site planning for a new central plant. Also air permitting for new boilers will need to be considered, since it is assumed the building will no longer be able to utilize steam from the GSA central plant;

Under the sustainability portion of the EA, there should be a comprehensive review of the building envelope to determine what minimum upgrades will be required for the developer to meet in order to reduce the building carbon footprint;

Public safety concerns during construction phases of the project. Disruption of crosswalks, sidewalk access, and construction safety;

Anticipated affects on local vehicular traffic, pedestrian travel and traffic, and mass transportation planning and patterns. Any affects on accessibility to mass transportation, or potential re-routing of access patterns. Contingency planning to mitigate anticipated impacts;

Noise impacts and mitigation planning;

Construction dust control and construction waste management;

Impact on courtyard and other common use areas;

Security concerns regarding the anticipated use of the OPO (office, retail, commercial, industrial) & plans for general public access to completed project;

The potential loss of the currently IRS occupied Annex space.

Again, thank you for the opportunity to provide our comments. Should you have any questions or concerns about the input we have submitted, please feel free to call me at 202.435.6300 or have a member of your staff call Mark Ennen at 202.543.6311.

Sincerely,

J. Stuart Burns  
Director  
Real Estate and Facilities Management



#### 4.5 TRANSPORTATION STUDY

The Old Post Office Redevelopment Final Transportation Study is attached as a separate document.

#### 4.6 NCPC ZONING MAP AMMENDMENT ACTION



**Commission Action**  
January 10, 2013

<b>PROJECT</b> Map Amendment to Establish Zoning at Square 323, Lot 800, and Parcels 1, 2 and 3 of Squares 349 and 350 Old Post Office and Annex 1100 Pennsylvania Avenue, NW Washington, DC	<b>NCPC FILE NUMBER</b> ZC 12-07
<b>SUBMITTED BY</b> Zoning Commission of the District of Columbia	<b>NCPC MAP FILE NUMBER</b> 1.26(06.00)43707
	<b>APPLICANT'S REQUEST</b> Approval of report to the Zoning Commission of the District of Columbia
	<b>ACTION TAKEN</b> Approve with conditions
	<b>REVIEW AUTHORITY</b> Advisory per 40 U.S.C. § 8724(a) and DC Code § 2-1006(a)

The Commission:

**Advises** the Zoning Commission of the District of Columbia that the proposed map amendment to establish zoning at Square 323 Lot 800, and Parcels 1, 2, and 3 of Square 349 and 350 will not adversely affect the federal interest.

**Notes** that while the United States General Services Administration intends to redevelop the Old Post Office and Pavilion Annex under the terms of a public-private partnership with the Trump Organization, the Old Post Office and Pavilion Annex, including the property upon which these structures reside, will remain federally owned and under federal jurisdiction and therefore remain subject to NCPC's in-lieu of zoning authority.

**Notes** that the United States General Services Administration will undertake all building permitting and inspections during construction of the Old Post Office redevelopment project and will carry out the project in a manner that is consistent with local land use policies and zoning and building codes to the maximum extent feasible in accordance with the provisions of 40 U.S.C. 3312 and the policies of the Comprehensive Plan for the National Capital: Federal Elements.

Deborah B. Young [Date]  
Secretary to the National Capital Planning Commission

#### **4.7 RESPONSES TO COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL ASSESSMENT**

The Draft Environmental Assessment for the redevelopment of the Old Post Office Building in Washington, DC, was released and the Notice of Availability was published in the Washington Post on December 7, 2012. Written comments on the Draft Environmental Assessment were accepted through January 9, 2013 and are addressed herein.

The following is a list of comments received from specific people and/or organizations and the responses to those comments. Responses to individual comment letters follow after each letter.

##### Written Comments

Robert Vogel, National Mall and Memorial Parks, National Park Service

J. Stuart Burns, Internal Revenue Service, Department of the Treasury

Caroline Hall, Advisory Council on Historic Preservation

Vera Jaffey, U.S. Army Corps of Engineers

Kim Dine, U.S. Capitol Police

James Hamre, Washington Metropolitan Area Transit Authority

Samuel Zimbabwe, District Department of Transportation

Phetamano Thannavong, District Department of the Environment

Cathy Lanier, Metropolitan Police Department

Jo-Ann Neuhaus

Shane Dettman, National Capital Planning Commission



## United States Department of the Interior

NATIONAL PARK SERVICE  
National Mall & Memorial Parks  
900 Ohio Drive, S.W.  
Washington, D.C. 20004-2000



D66 (NCR-NAMA)

January 9, 2013

U.S. General Service Administration, Public Buildings Service  
Attention: Ms. Suzanne Hill, NEPA Program Lead  
301 7th Street, SW, Room 4004  
Washington, DC 20407

Subject: National Mall and Memorial Parks comments on the Old Post Office Redevelopment  
Draft Environmental Assessment

Dear Ms. Hill:

The National Park Service's National Mall and Memorial Parks (NAMA) has reviewed the Old Post Office (OPO) Redevelopment Draft Environmental Assessment (EA). We request the following comments be addressed in the final Environmental Assessment.

Project Description

The U.S. General Services Administration (GSA) has prepared an EA to analyze the potential impacts from the proposed redevelopment of the Old Post Office Building (OPO), located at 1100 Pennsylvania Avenue, NW, Washington DC. The EA is being prepared in accordance with Section 102 of the National Environmental Policy Act. NEPA requires a Federal agency to provide the public with an opportunity to participate in the process of analyzing impacts to the human environment that could result from the proposed Federal action. Under the Preferred Alternative (the Action Alternative), the OPO would be redeveloped as a mixed-use luxury hotel and conference facility. The existing clock tower, which is managed by GSA with interpretive services provided by NAMA staff, would continue to be open to the public.

NAMA Comments

Security screening

Currently, the public entrances to the OPO require security screening of visitors. Under the Action Alternative, public access would be facilitated by removing security screening from entries. While we agree that this is an appropriate measure for access to the hotel, we encourage GSA to coordinate with appropriate law enforcement to determine any necessary security measures for the entrance to the tower.



**Comment 1:** Comment noted. Final EA has been revised, please see Section 3.3.4.

1



*Minor Corrections*

- Figure 2-2 on page 2-4 labels the ground floor museum as the "National Park Service Museum" and the tower as the "NPS Tower." In other locations of the EA, these are referred to as the Congress Bells Museum and the clock tower. Because these facilities are not under management of the National Park Service, but rather GSA, please remove NPS from the labels on Figure 2-2.
- The first full paragraph on page 3-4 begins with "Numerous recreational amenities operated by the NPS are located in the vicinity of the OPO." Because the Pennsylvania Avenue National Historic Site does not contain active recreational opportunities, please delete this first sentence.
- Page 3-4 notes that bleachers that are located along Pennsylvania Avenue during inauguration events. Please add that 36 CFR Part 7 designates specific locations for these bleachers.
- Page 3-4 states that Pershing Park features a fountain that converts to an ice skating rink in the winter. This should note that the ice skating rink is not currently operable.
- Page 3-11 states that the Potomac Heritage Trail run along Pennsylvania Avenue, however this is incorrect. We believe this should be revised as the Federal Triangle Heritage Trail.
- Page 3-16 describes elements of the Pennsylvania Avenue Plan, such as lighting. This should note that the plan also defined streetscape elements in addition to lighting.
- Please remove the phrase "that have been permitted by NPS" on page 3-33.
- Add "National" to Mall Plan on page 3-80.
- The cumulative impacts section (3.15) should include the ongoing project to repair earthquake damage to Washington Monument. See [www.nps.gov/wamo/washington-monument-earthquake-update.htm](http://www.nps.gov/wamo/washington-monument-earthquake-update.htm) for details.
- Ford's Theatre now under the NAMA Superintendent. Please update your distribution list on page 4-8.

**Comment 7:** Comment noted. Final EA has been revised. Please see Section 2.2.1.

**Comment 8:** Comment noted. Final EA has been revised. Please see Section 3.2.1.

**Comment 9:** Comment noted. Final EA has been revised. Please see Section 3.2.1 and Section 3.2.2.

**Comment 10:** Comment noted. Final EA has been revised. Please see Section 3.2.1.

**Comment 11:** Comment noted. Final EA has been revised. Please see Section 3.2.4.

**Comment 12:** Comment noted. Final EA has been revised. Please see Section 3.2.4.

**Comment 13:** Comment noted. Final EA has been revised. Please see Section 3.5.4.

**Comment 14:** Comment noted. Final EA has been revised. Please see Section 3.15.2.

**Comment 15:** Comment noted. Final EA has been revised. Please see Section 3.15.2.

**Comment 16:** Comment noted. Final EA has been revised. Please see Section 4.3.

*Old Post Office Tower and Related Exhibits*

The EA states that, under the Action Alternative, the clock tower would remain open to the public. It does not address the current condition of the tower or whether improvements would be made to the interior of the tower during the OPO redevelopment project; it is also unclear how the tower, the proposed museum, and any necessary NPS office space would be managed in the future. The proposed Congress Bells Museum to be located on the ground level may contain interpretive content that overlaps with exhibits currently located in the tower.

Currently, visitors to the tower begin their experience with a tour through an exhibit space detailing the history of the Old Post Office Building, the Official Bells of Congress, and the postal system. The tour continues up into the tower where visitors can see the bells and panoramic views of the city. The facility, resources, and collections in the tower are owned by GSA; however, NPS staff currently interprets the space to the public. NPS staff have observed artifact deterioration due to lack of proper exhibit methods and environmental controls, outdated technology for interpretive text and media, dust and debris on the bells, and significantly peeling paint. The obviously deteriorating condition and harmful exhibition method of the resources reflects poorly on the NPS. The office space currently used by NAMA staff is also in deteriorated condition, and staff have serious concerns relating to accessibility and environmental conditions within this space.

We recommend that GSA update the EA to reflect the current status of the exhibit space, and to clarify their intentions for long-term management of the tower, existing exhibits, the proposed new Congress Bells Museum, and any related office space.

*Jurisdiction and Management of Pennsylvania Avenue*

The EA correctly notes (page 3-15) that the NPS has jurisdiction over space located between the face of the building and the curb line. Please reference 40 USC Chapter 67, Pennsylvania Avenue Transfer Legislation, as the source of this jurisdictional authority. Due to this jurisdiction, the following components of the Action Alternative would require consultation and approval from NPS prior to implementing: the proposed curb cut for the 11<sup>th</sup> Street access drive, the proposed restaurant seating, and other proposed changes to the setting, such as new lighting and tree and planter removals. The revised EA should make this clarification where appropriate (e.g., on page 3-19.)

NPS recognizes the need for consistency regarding management and maintenance of the Pennsylvania Avenue National Historic Site, and is currently developing an Environmental Assessment to evaluate alternatives to make it a more vital space and enhance "America's Main Street." Please update the EA to reference this planning effort (e.g., in section 3.2 and/or 3.3). Further updates will soon be placed on [www.nps.gov/nationalmallplan/PennAve.html](http://www.nps.gov/nationalmallplan/PennAve.html).

**Comment 2:** Comment noted. Final EA has been revised. Please see Section 2.2.6, Section 3.2.1, and Section 3.2.2.

**Comment 3:** Comment noted. Final EA has been revised. Please see Section 3.2.1.

**Comment 4:** Comment noted. Final EA has been revised. Please see Section 3.2.1 and 3.2.2.


**Comment 5:** A transfer of jurisdiction has been included in the proposed action and is referenced in the impacts analysis throughout the document. The Final EA was reviewed by NPS and coordinated with NPS to include the appropriate analysis and language regarding the transfer of jurisdiction.

**Comment 6:** Added project to cumulative impacts analysis, see Section 3.15.

Thank you for the opportunity to comment on the Draft EA. For further information or consultation regarding the National Mall and Memorial Parks, please contact Mr. James Perry, at (202)245-4711 or via email at [james\\_perry@nps.gov](mailto:james_perry@nps.gov).

Sincerely,



 Robert A. Vogel  
Superintendent  
National Mall and Memorial Parks



DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, D.C. 20224

JAN 9 2013

Ms. Suzanne Hill  
NEPA Program Lead  
General Services Administration  
Public Buildings Service  
301 7<sup>th</sup> St., SW, Room 4004  
Washington, DC 20407

Dear Ms. Hill

We appreciate the opportunity to review and comment on the December 2012 Environmental Assessment (EA) documents for the Old Post Office (OPO) Building Redevelopment. At this time we do not have any comments to forward.

The scope and detail of the OPO EA documents are comprehensive and well stated. We look forward to receiving the final version of these documents.

Should you have any questions or concerns, please feel free to call me at (202) 435-6332, or have a member of your staff call Joe Colaciello at (202) 435-6352.

Sincerely,

J. Stuart Burns  
Director  
Real Estate and Facilities Management

**Comment 17:** Comment noted.

17



January 3, 2013

Ms. Suzanne Hill  
NEPA Program Lead  
National Capital Region  
U.S. General Services Administration  
301 7<sup>th</sup> Street, SW, Room 4004  
Washington, DC 20407

Ms. Nancy Witherell  
Regional Historic Preservation Officer  
National Capital Region  
U.S. General Services Administration  
7<sup>th</sup> and D Street, SW, Room 2020  
Washington, DC 20407

**RE: Proposed Lease and Redevelopment of the Old Post Office Building  
Washington, DC**

Dear Ms. Hill and Ms. Witherell:

On December 7, 2012, the Advisory Council on Historic Preservation (ACHP) received a copy of the Draft Environmental Assessment (EA) from the U.S. General Services Administration (GSA), which was prepared for the subject project in accordance with the National Environmental Policy Act (NEPA). The ACHP does not have any comments pursuant to NEPA at this time.

On January 19, 2011, the ACHP responded to a letter from Mr. Gary Porter, Regional Historic Preservation Office, National Capital Region, which indicated that GSA intended to prepare an EA for the subject project in accordance with NEPA, and to coordinate the public outreach and involvement requirements of the EA with those of Section 106 of the NHPA (Section 106) and our regulations, *Protection of Historic Properties*, 36 CFR § 800.8.

The questions that ACHP posited in that letter have since been addressed at regular and ongoing consultation meetings, held by GSA in accordance with Section 106 of the NHPA and our regulations, beginning on May 22, 2012. ACHP is participating in consultation to develop a programmatic agreement for the subject project, per our letter to GSA, dated June 25, 2009.

As a point of clarification, in our last letter ACHP incorrectly referred to the subject property as a National Historic Landmark. The subject property is individually listed in the National Register of Historic Places, is located within the Pennsylvania Avenue National Historic Site, and contributes to the Federal Triangle Historic District.

ADVISORY COUNCIL ON HISTORIC PRESERVATION  
1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004  
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

**Comment 18:** Comment noted.

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If you have any questions or require our further assistance, please contact Ms. Kirsten Kulis, GSA Liaison, at 202-606-8517 or via e-mail at [kkulis@achp.gov](mailto:kkulis@achp.gov).

Sincerely,



Caroline D. Hall  
Assistant Director  
Office of Federal Agency Programs  
Federal Property Management Section

**Comment 19:** Comment noted.



Suzy Hill - WPDB <suzanne.hill@gsa.gov>

**Old Post Office Building Redevelopment EA - USACE comments (UNCLASSIFIED)**

1 message

**Jaffe, Vera NAB** <Vera.B.Jaffe@usace.army.mil>

Mon, Jan 28, 2013 at 2:06 PM

To: Suzy Hill - WPDB <suzanne.hill@gsa.gov>

Cc: "adion.chinkuyu@dc.gov" <adion.chinkuyu@dc.gov>, "McQuale, Christopher (DDOE)" <christopher.mcquale@dc.gov>

Classification: UNCLASSIFIED

Caveats: NONE

Dear Ms. Hill:

This is in reference to your letter dated December 2012 requesting U.S. Army Corps of Engineers (Corps) review and comment on an Environmental Assessment for the proposed redevelopment of the Old Post Office Building, located 1100 Pennsylvania Avenue NW, Washington, D.C. This coordination has been assigned the number 2013-00154 (OLD POST OFFICE BLD REDEVELOP/WASHINGTON DC). The Corps received the letter on December 26, 2012.

Our evaluation has determined that the proposed work, if accomplished in accordance with the attached plans, does not require a Department of Army authorization pursuant to Section 10 of the Rivers and Harbors Act of 1899 and/or Section 404 of the Clean Water Act since no work is proposed in, over, or under navigable waters and no fill is proposed within Section 404 waters. The proposed work does not appear to impact wetlands and/or waters of the U.S. If any of the information contained in the letter and/or plan(s) is later found to be in error, this determination may be subject to modification, suspension, or revocation. If, at a later date, the proposed work is discovered to impact wetlands and/or waters of the U.S., or if the proposed scope of work changes, please coordinate the revised plan(s) and accompanying information with our office.

If you have any questions concerning this matter, please don't hesitate to contact me.

Thank you,

Vera B. Jaffe  
Biologist - Regulatory Specialist, Maryland Section Southern  
US Army Corps of Engineers, Baltimore District Operations Division,  
Regulatory Branch  
410-962-6144  
410-962-6024 (fax)  
Vera.B.Jaffe@usace.army.mil  
<http://www.nab.usace.army.mil/Wetlands%20Permits/>  
<http://www.facebook.com/USACEBaltimore> <<http://www.facebook.com/USACEBaltimore%20>>

Directions to office:

<http://www.nab.usace.army.mil/about%20Us/directions.htm>

Classification: UNCLASSIFIED

Caveats: NONE

2013-00154 plans.pdf  
341K

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## UNITED STATES CAPITOL POLICE

OFFICE OF THE CHIEF  
110 D STREET, NE  
WASHINGTON, DC 20510-7218

January 4, 2013

COP 121249

U.S. General Services Administration,  
Public Buildings Service  
Attention: Ms. Suzanne Hill, NEPA Program Lead  
301 7<sup>th</sup> Street, SW, Room 4004  
Washington, DC 20407

Dear Ms. Hill:

As requested, the United States Capitol Police, Security Services Bureau has reviewed the Draft Environmental Assessment for the redevelopment of 1100 Pennsylvania Ave, NW the Old Post Office Building. As part of a Draft Environmental Assessment (EA), input on potential impacts, including human environmental impacts were evaluated.

Based on a study conducted by the U.S. Capitol Police in 2006, the Old Post Office Building would fall outside of the most significant zone of concern for potential threats; however, any changes to increase the height of the building should be brought to our attention.

Should you have any further questions regarding this matter please do not hesitate to contact me.

Very Respectfully,

Kim C. Dine  
Chief of Police

**Comment 20:** Comment noted.**20**





December 28, 2012

Ms. Suzanne Hill, NEPA Program Lead  
U.S. General Services Administration  
Public Buildings Service  
301 7<sup>th</sup> Street SW, Suite 4004  
Washington, DC 20407-0001

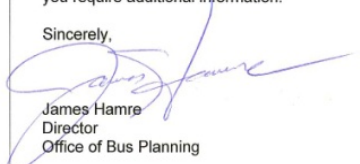
Dear Ms. Hill:

We are in receipt of Acting Regional Commissioner William Dowd's letter regarding the Draft Environmental Assessment (EA) to evaluate the potential impacts associated with the proposed redevelopment of the Old Post Office building at 1100 Pennsylvania Avenue in Northwest Washington. The Washington Metropolitan Area Transit Authority (WMATA) offers the following comments:

- WMATA's Bus Planning Department will work with the District Department of Transportation's (DDOT) transit coordinator to establish the feasibility of relocating or consolidating the affected bus stops. Bus stops should be appropriately located and should include necessary amenities, at the developer's expense.
- WMATA will also coordinate with DDOT on the relocation of any existing bus stops during the construction phase, at the preferred selected developer's expense. The developer must contact each agency at least two weeks before the start of the actual construction work to ensure that bus customers are notified of the project before work begins.

This concludes WMATA's comments on this matter. Please let us know if you require additional information.

Sincerely,

  
James Hamre  
Director  
Office of Bus Planning

Washington  
Metropolitan Area  
Transit Authority  
600 Fifth Street, NW  
Washington, DC 20001  
202/962-1234

By Metrorail:  
Judiciary Square—Red Line  
Gallery Place Chateaufort—  
Red, Green and  
Yellow Lines  
By Metrobus:  
Routes D1, D3, D6, H6,  
70, 71, 80, X2

A District of Columbia,  
Maryland and Virginia  
Transit Partnership

**Comment 21:** Comment noted. Final EA has been revised. Please see Section 3.11.10.

**Comment 22:** Comment noted. Final EA has been revised. Please see Section 3.11.10.

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**Comment 23:** Comment noted.

## GOVERNMENT OF THE DISTRICT OF COLUMBIA

## DEPARTMENT OF TRANSPORTATION



d. Policy Planning and Sustainability Administration

## MEMORANDUM

**TO:** Suzanne Hill  
NEPA Program Lead  
Office of Planning & Design Quality  
U.S. General Services Administration, NCR

**FROM:** Samuel Zimbabwe  
Associate Director, PPSA  
District Department of Transportation

**DATE:** January 10, 2013

**SUBJECT:** DDOT Comments on the Old Post Office Building Redevelopment Environmental Assessment

Based on DDOT's review of the detailed traffic studies that deal with the transportation impacts of the proposed redevelopment of the Old Post Office Building the following items reflect DDOT's opinions on the specific transportation impacts:

- Based on the Year 2016 build-out traffic conditions and analysis results under full access and partial access (right-in/right-out) scenarios, all of the study area intersections are projected to operate at acceptable Levels of Service (LOS) during the morning, afternoon, and Saturday peak hours. Based on the review of the existing and future traffic conditions from operational and safety perspectives, it is DDOT's opinion that the proposed change in zoning and subsequent land uses would not have any adverse impacts on the transportation network.
- DDOT believes that even if a different development program is chosen for the site, the analysis provided by GSA represents transportation conditions that may be anticipated from similar downtown land uses. However, it is also important to note that in the case of a proposal to

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*DDOT Comments on the Old Post Office Building Redevelopment – Draft Environmental Assessment  
January 10, 2013*

change the anticipated development program significantly, GSA would be required to prepare and submit a revised the EA document to DDOT (and other agencies) for review and comments. At that stage, DDOT would have an opportunity to evaluate the impacts of the new redevelopment program on the transportation network.

- As part of DC Regulations and DDOT's current development review procedures, the developer/lessee is expected to undergo a public space permitting process in order to obtain necessary permits. The following are expected to be addressed by the potential developer/lessee during the public space permitting process:
  - Southward extension of 11<sup>th</sup> Street from its current terminus at the Pennsylvania Avenue intersection is the preferred vehicular access scenario. DDOT has no concerns for the proposed modifications under full access or partial access (right-in/right-out) scenarios. However, it is expected that, during the public space permitting process, design and construction of the proposed alignment and associated modifications traffic control devices at the Pennsylvania Avenue and 11<sup>th</sup> Street intersection, as well as the extension of 11<sup>th</sup> Street are closely coordinated with DDOT.
  - There were several locations identified where the bus stops are on the near-side of the intersection or may conflict with access points. These stops may need to be moved, and DDOT will work with the developer/lessee to finalize the location and coordination of such relocations.
  - Based on the final redevelopment program of the subject building, DDOT will determine adequate number of on-site bicycle parking spaces, along with shower/locker facilities for the potential employees of the proposed development(s).
  - In order to further promote alternative modes of transportation for employees, additional TDM measures such as transit subsidies (full or pre-tax dollars), payment of membership fees for Capital Bikeshare and carsharing services, etc. should be considered. At the time of permitting process, DDOT would work with the developer/lessee to craft the specifics of the TDM program that is tailored to the particulars of the finalized land use program.

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**Comment 24:** Comment noted. The Final EA has been updated to include the items listed, please see Section 3.11.4, 3.11.7, and 3.11.10.

SZ|mfo

**District of Columbia Department of the Environment****Comments on the Environment Assessment: Old Post Office Building Redevelopment**

Date: January 9, 2013

**Floodplain Management****General Comments:**

1. The project site is within a high risk flood zone--Special Flood Hazard Areas (SFHA) or 100-year floodplain--designated as Zone AE in accordance with the Flood Insurance Rate Map (FIRM), effective date September 27, 2010. Any development in SFHA is subject to requirements of DC's floodplain regulations: DCMR 20, Chapter 31 – Flood Hazard Rules and flood provisions of DCMR 12 – DC Construction Codes Supplement of 2008 or the latest amendment.
2. The District Department of the Environment (DDOE) is the Floodplain Administrator and the National Flood Insurance Program (NFIP) coordinating agency for the District of Columbia. DDOE, in coordination with the DC Department of Consumer and Regulatory Affairs (DCRA) and other DC agencies, reviews and approves any development in SFHA in compliance with floodplain regulations. More information on the floodplain management program: <http://ddoe.dc.gov/service/floodplain-management>

**Comment 25:** The project site is within a high risk flood zone--Special Flood Hazard Areas (SFHA) or 100-year floodplain--designated as Zone A in accordance with the Federal Emergency Management Agency Flood Insurance Rate Map (FIRM), effective date September 27, 2010 (FEMA 2010). According to the FIRM, the Zone A designation indicates determined special flood hazard area that is subject to inundation by the one percent annual chance flood (FEMA 2010). Final EA has been revised. Please see Section 3.9.1.

**Comment 26:** Comment noted. Final EA has been revised. Please see Section 3.9.1.

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3. DCRA proposed new 2013 DC Construction Codes that would adopt 2012 ICC Codes. The public comment period will end on January 25, 2013. More information:  
<http://dcra.dc.gov/DC/DCRA/About+DCRA/News+Room/Rulemaking/DCRA+Proposes+New+2013+D.C.+Construction+Codes>

4. Publications ASCE 24, Flood Resistant Design and Construction and ASCE 7 provide techniques and protective measures and flood load design criteria including dry floodproofing, flood resistant materials in order to meet above requirements.

5. Under mandatory purchase requirement, anyone with a federally guaranteed mortgage for a property in a SFHA must have flood insurance.

6. Under the Biggert-Waters Flood Insurance Reform Act of 2012 signed by the President on July 6, 2012, it allows FEMA to remove subsidized rates and allow rates to increase by 25% per year until actuarial rates are achieved. For more information:  
<http://www.floods.org/index.asp?menuID=651&firstlevelmenuID=187&siteID=1>

**Comment 27:** Comment noted. Final EA has been revised to reflect this comment. Please see Sections 3.2.4 and 3.9.1.

**27 Comment 28:** Comment noted. See response above. GSA will use GSA's Facilities Standards for the Public Buildings Service (P100) as a standard for the design and construction of the renovation.

**Comment 29:** Comment noted.

**28 Comment 30:** Comment noted.

**29**

**30**

7. Does the development consider the impact of the hurricane storm surge? According to the U.S. Army Corps of Engineers (USACE) and FEMA report on Washington, DC Metropolitan Area Hurricane Storm Surge Mapping, dated June 2009, the storm surge elevations in this area are 6.8, 12.6, 18.1, 26.1 Feet (NGVD 1929) for hurricane Categories I, II, III, and IV, respectively. For more information:  
<http://ddoe.dc.gov/floodplainmap>
8. Does the development consider the impact sea level rise in the region? Review the article: Prediction and Impact of Sea Level Rise on Properties and Infrastructure of Washington, DC:  
<http://onlinelibrary.wiley.com/doi/10.1111/j.1539-6924.2011.01710.x/full>

31

**Comment 31:** Comment noted. Final EA has been revised. Please see Section 3.9.1.

**Comment 32:** Comment noted. Final EA has been revised. Please see Section 3.9.2.

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**Comment 33:** The OPO is an existing historic building whose redevelopment would not affect flood elevations as no new structures are being constructed. As a result, the OPO redevelopment would not adversely and directly affect the floodplain.

#### Specific Comments:

1. *Page 2-16, Table 2-2, "Floodplains – Action Alternative: Negligible direct and indirect impacts"*  
*Page 3-50, first paragraph: "The OPO site is located within a floodplain; therefore, any future redevelopment of the site would result in direct impacts to floodplains."*
- Why does Table 2-2 state that there are negligible direct impacts?

33

2. *Page 3-50, first paragraph: "GSA has also informed the preferred selected developer for the site that that property is within a floodplain."*

- Please include in the Environment Assessment DDOE's role and responsibility on floodplain management, floodplain development permit, and coordinating the National Flood Insurance Program (NFIP) with FEMA. Therefore, the preferred selected developer can contact the agency with further questions and more information on compliance.
- DDOE is a member of the working group of the Federal Triangle Stormwater Drainage Study. The full report can be obtained from the National Capital Planning Commission (NCPC):  
[http://www.ncpc.gov/ncpc/Main\(T2\)/Planning\(Tr2\)/flooding.html](http://www.ncpc.gov/ncpc/Main(T2)/Planning(Tr2)/flooding.html)
- DDOE's Flood Zone Determination Tool:  
<http://ddoe.dc.gov/floodplainmap>

**Comment 34:** Comment noted. Final EA has been revised. Please see Section 3.9.2.

34

3. Page 3-50, "Step 4: Because the site is already developed, there would be no net loss of the beneficial or natural values of the floodplain from redevelopment of the OPO. The preferred selected developer of the OPO would be required to adhere to appropriate building practices for construction in a floodplain, including not changing the natural flood channel, adhere to applicable building codes for construction in a floodplain, or developing a flood management plan. Therefore, indirect and direct impacts to floodplains would be negligible."

- According to DCMR 20, Chapter 31-Flood Hazard Rules:

- 3105.2 Within SFHAs, the lowest floor (including basement) of any new construction of, or substantial improvement to, *residential structures* shall be at least one and one-half feet (1-1/2 ft.) above the base flood elevation and shall be verified by an Elevation Certificate (FEMA Form 81-31) or its latest available version from [www.fema.gov](http://www.fema.gov).

**Comment 35:** Comment noted. Final EA has been revised. See references to 40 USC § 3312 in Section 3.9.2.

35



- 3105.3 Within SFHAs, the lowest floor (including basement) of any new construction of, or substantial improvement to, *non-residential structures* shall be at least one and one-half feet (1-1/2 ft.) above the base flood elevation or be designed and constructed to be floodproofed during any flood up to that height. Elevation and floodproofing shall be verified by an Elevation Certificate (FEMA Form 81-31) and a Floodproofing Certificate (FEMA 81-65), or their latest available versions from [www.fema.gov](http://www.fema.gov).
- 4. What are the lowest floor elevations of the Building and the Annex? The base flood elevation at this site approximately 13 ft. (NAVD 88).
- 5. How will the redevelopment compliance with these provisions?
- 6. *Page 3-49: "STEP FIVE: Minimize threats to life, property..."*
  - How can this redevelopment minimize threats to life and property? By redevelopment of the site, does it mean putting more people and higher value property at risk?

36

37

38

**Comment 36:** The lowest floor elevation of the building is the basement level, which will not contain residential uses.

**Comment 37:** This project is not required to comply with these provisions. See 40 USC § 3312. In the Final EA, a separate section has been added noting the mitigation measures that will be implemented to comply with E0 11988. Please see Section 3.9.2.

**Comment 38:** The redevelopment of the site is authorized by legislation, please see Chapter 1. The preferred selected developer is taking measures to minimize threats to life and property, such as not locating guest rooms in the basement of the building. Furthermore, in order to minimize threats to life, the basement of the OPO Building and Annex will serve non-occupation functions, such as parking, retail, and back-of-house hotel and restaurant activities. No guest rooms would be located in the basement.

7. *Page 3-50, Step 5: "...Among these is the use of Low Impact Development Strategies (Green Infrastructure)."*

- LID implementation at the project site alone does not reduce the risks of flooding and minimize adverse impacts on the floodplain.

8. *Page 3-50, "During the 2006 rain event that flooded the Federal Triangle, the Annex experienced flooding in the basement floor."*

- How will the redevelopment design and construction to prevent damages from future flooding, specifically interior flooding (i.e., non riverine flooding), in the Federal Triangle area? The 17<sup>th</sup> Street levee will protect the area from the riverine flooding.

9. *Page 3-51, "Under the No Action Alternative, improvements to the OPO Building and site would not be undertaken. Thus, impacts to floodplains would be negligible."*

*Page 3-50, "During the 2006 rain event that flooded the Federal Triangle, the Annex experienced flooding in the basement floor."*

*Page 2-16, Table 2-2, "Floodplains – No Action Alternative: Negligible impacts"*

- It looks like under the No Action Alternative, there is some impact.

**Comment 39:** Comment noted. Final EA has been revised.  
39 Please see Section 3.9.2.

**Comment 40:** Comment noted. Final EA has been revised.  
Please see Section 3.9.2.

**Comment 41:** Comment noted. Final EA has been revised.  
Please see Section 3.9.2.

40

41

*10. Page 3-49, Figure 3-10: STEP FIVE*

- Is this redevelopment considered a “critical action”?
- According GSA’s Floodplain Management Desk Guide:  
“A “critical action” is any activity for which even a slight change of flooding would be too great.”  
“If there is no practical alternative and a critical action must be located within a 100-year or 500-year floodplain, structures should be elevated above the 500-year base flood.”
- How will the redevelopment comply with the guidance?

**42**

**Comment 42:** Comment noted. Final EA has been revised. Please see Sections 3.9.1 and 3.9.2.



GOVERNMENT OF THE DISTRICT OF COLUMBIA  
METROPOLITAN POLICE DEPARTMENT

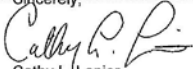
DEC 21 2012

Ms. Suzanne Hill  
U.S. General Services Administration  
301 7<sup>th</sup> Street, S.W., Room 4004  
Washington, D.C. 20407-0001

Dear Ms. Hill:

This is in response to your letter regarding the Draft Environmental Assessment (EA) of the proposed redevelopment of the Old Post Office Building (OPO), located at 1100 Pennsylvania Avenue, N.W., Washington, D.C. The Metropolitan Police Department (MPD) appreciates the opportunity to comment, yet has no concerns at this time.

Sincerely,

  
Cathy L. Lanier  
Chief of Police

P.O. Box 1606, Washington, D.C. 20013-1606

**Comment 43:** Comment noted.

**43**

----- Forwarded message -----

From: **Jo-Ann Neuhaus** <[penquarterdc@gmail.com](mailto:penquarterdc@gmail.com)>

Date: Thu, Jan 3, 2013 at 4:39 AM

Subject: Comments concerning the Draft Environmental Assessment and Development Proposal for the Old Post Office Building at Pennsylvania Avenue and 12th Street, NW

To: [Suzanne.Hill@gsa.gov](mailto:Suzanne.Hill@gsa.gov)

Cc: [william.dowd@gsa.gov](mailto:william.dowd@gsa.gov), [Nancy.Witherell@gsa.gov](mailto:Nancy.Witherell@gsa.gov), [shane.dettman@ncpc.gov](mailto:shane.dettman@ncpc.gov), [christine.saum@ncpc.gov](mailto:christine.saum@ncpc.gov), [TLuebke@cfa.gov](mailto:TLuebke@cfa.gov)

To whom it may concern.

Following are my comments on the proposal to create a curb cut on the south side of Pennsylvania Avenue so that those arriving by private or public vehicle at the proposed Trump hotel may drive up to the front door.

I am submitting these comments to you because as a former 20-year veteran of the Pennsylvania Avenue Development Corporation and an Urban Planner I am appalled that you intend to allow a curb cut on Pennsylvania Avenue for a driveway – something PADC did not allow at The Willard, at the Canadian Embassy, or at the development now known as the Ronald Reagan Building and International Trade Center. My comments express my concern with the legacy PADC left and how its stewards are managing it – or not.

I understand that The Plan does not specifically forbid curb cuts on the south side of the Avenue, with good reason. Just as The Plan and General Guidelines did not specify the re-use of the Tariff Commission building or several other buildings that it assumed would

**Comment 44:** Comment noted. Final EA has been revised.  
Please see Section 3.2.4 and 3.2.5.

44

remain and not be redeveloped or renovated for a generation or more due to their existing use or their economic life, it did not specifically address curb cuts on the south side of the Avenue: who would have guessed that there would be a new development in the Federal Triangle desirous of a curb cut for a driveway. However, when PADC became responsible for the development of the former parking lot between 13th and 14th streets, NW – locally known as the Federal Triangle parking lot and now known as the Ronald Reagan Building International Trade Center – the development guidelines dictated where parking and loading access could be created so as to not allow a curb cut on The Avenue. Requests on the north side of The Avenue had also been denied given that The Plan and the General Guidelines forbid curb cuts across the north sidewalk areas of Pennsylvania Avenue “in order to reinforce its importance as the major pedestrian thoroughfare of the Development Area.”

The Plan is a general document and did not go into details of where curb cuts could or could not be. At the time the staff wrote the General Guidelines there was no reason to note that this should hold for the south sidewalk along Pennsylvania Avenue since there were no development plans in the foreseeable or distant future. Reinforcing this was the fact that GSA and NPS were represented on the PADC Board of Directors, which approved The Plan and General Guidelines. At no time did either representative suggest that the Board might want to consider prohibiting curb cuts on the south side of Pennsylvania Avenue in these documents “in order to reinforce its importance as the major pedestrian thoroughfare of the Development Area” which they and the staff would have made had there been any thought of development changes in the Federal Triangle area. PADC staff had worked with GSA staff on the RFP for what became the Pavilion at the Old Post Office; there was never any suggestion that deliveries would take place from Pennsylvania Avenue, thus no thought to prohibiting curb cuts at that time.

I ask, how can those responsible for oversight of The Plan achieve the stated goal if curb cuts for a driveway – and let’s be totally clear, it is for a driveway for a private development project; it is not reintroducing a street that has long been gone – think that they are not violating one of the strongest, clearest directions in The Plan: Curb cuts that allowed vehicles to cross a Pennsylvania Avenue sidewalk were prohibited “in order to reinforce its importance as the major pedestrian thoroughfare of the Development Area.” [See Section 910.17 of Part 910 – General Guidelines and Uniform Standards for Urban Planning and Design of Development within the Pennsylvania Avenue Development Area, published in the Federal Register on page 370. See also Section 910.57 Curb-cut. “*Curb-cut* means that portion of the curb and sidewalk over which vehicular access is allowed.” on page 373. Further Section 910.62 The Plan. “*The Plan* means The Pennsylvania Avenue Plan – 1974, as amended, and prepared pursuant to Pub. L. 92-578, 86 Stat. 1266 (40 U.S.C. 871), and the document which sets forth the *development* concepts upon which this Part 910 and *Square Guidelines* are based.”]

I strongly suggest that the GSA also read the General Guidelines Section 910.2 Purpose, as it places the importance of the Public Improvements Program in perspective. In part it says:

"Public improvements construction consists of implementation by the Corporation of the Public

Improvements Program which is a comprehensive plan for the design and construction of public

amenities in public spaces and selected thoroughfares within the Development Area. This

program outlines the details of roadway and sidewalk improvements, public space configuration,

and pedestrian amenities."

Obviously, the Corporation followed its own Public Improvements Program when it designed and constructed the public improvements along The Avenue, including a work of art in the pavement in front of the Old Post Office Building. You will also note that there is NO curb cut or driveway anywhere along the entire south sidewalk. That design as carried out needs to be observed and The Avenue's current stewards need to uphold the goals so clearly stated in the General Guidelines vis-à-vis curb cuts and Public Improvements.

Very truly yours,

Jo-Ann Neuhaus

**Jo-Ann Neuhaus**

The Ventana #508 | 912 F Street, NW | Washington, DC 20004-1448

[202.626.0011](tel:2026260011) land line | [240.688.9200](tel:2406889200) mobile

Though I am sending this email as my personal comments, I can also be reached at [joann@PennQuarter.org](mailto:joann@PennQuarter.org)

## NCPC STAFF COMMENTS

PROJECT: Old Post Office Redevelopment Draft Environmental Assessment and Transportation Study (NCPC File No. 7459)

NCPC Point of Contact: Shane L. Dettman (email: shane.dettman@ncpc.gov, phone: 202.482.7267)

Date: January 17, 2013

Section	Page	Comment	Response
<b>General</b>			
	2	Typo. Please replace “National Capital Park and Planning” with “National Capital Planning Commission.” It seems as written, the text may be referring to the name of the local park and planning departments of Montgomery and Prince George’s County, Maryland; the name of that entity being the Maryland-National Capital Park and Planning Commission, or M-NCPPC. While at one time NCPC retained the name National Capital Park Commission, it has not had that name since 1952 when Congress passed the National Capital Planning Act, which established NCPC as the central planning agency for the federal government in the National Capital Region.	Final EA revised to reflect this comment. See Page 2
	2	Typo in third line of paragraph	Final EA revised to reflect this comment. See Page 2.
	-	Prior to final release of the EA, all diagrams, figures, tables, etc. should be updated to reflect the most current plans and the analysis should be fact checked to determine if additional analysis is necessary as a result of any changes in the plans. If changes have occurred, a note should be made indicating that changes have occurred since draft and whether additional analysis was necessary.	The Final EA includes the most current plans. If additional analysis was required, this is noted in the EA.
	-	The description that the clock tower will remain open to the public should be evaluated for clarity. GSA has stated that despite the redevelopment project, this building will continue to be considered a federal public building. In	Comment noted. The Final EA has been revised throughout to reflect this comment.



Section	Page	Comment	Response
		addition, outside of the hotel, there will be several areas of the hotel that will be available to the general public not staying at the hotel (museums, retail, and restaurants). It is important that the EA not inadvertently characterize the post-redeveloped OPO as a private building with a public clock tower.	
Table of Contents			
	i	Typos	Comment noted. Final EA has been revised to reflect this comment.
	ii	Typos	Comment noted. Final EA has been revised to reflect this comment.
1.1			
	1-1	The statement that “An EA is considered the appropriate level of documentation for the proposed action given that the redevelopment of the OPO Building involves existing structures” should be eliminated. This is a presumptive sentence that is not at all consistent with the intent of NEPA and the use of an EA to help determine whether an EIS is necessary. The threshold for whether an EA is appropriate should have nothing to do with the fact that the action involves existing structures, especially considering the significant historic nature of the building and the surrounding context.	Comment noted. Final EA has been revised to reflect this comment. See Section 1.1.
1.2			
	1-3	The paragraph beginning with “In 1976” is unclear. For example, what lease is being referred to? Is this referring to the retail that was in the Annex? When was the Annex constructed?	Comment noted. Final EA has been revised to reflect this comment. See Section 1.2.
	1-3	Modify sentence: “After reviewing the ten proposals received...”	Comment noted. Final EA has been revised to reflect this comment. See Section 1.2.

Section	Page	Comment	Response
1.3			
	1-4	Is the purpose and need really to comply with the OPO Redevelopment Act? Also, both the purpose and the need are stated as being the same thing...to comply with the Act. It would be more accurate to describe the purpose and need in terms of the reasons why Congress passed the Act and the goals included in the RFP. For example, isn't the purpose and need of the redevelopment to leverage a public-private partnership in order to preserve a historic federal asset and put it to its highest and best use while maintaining public access and providing a positive financial gain to the government?	EA has been revised to reflect this comment. Please see Section 1.3.
	1-4	Replace "undertaking" with "proposed action"	Comment noted. Final EA has been revised to reflect this comment. See Section 1.3.
1.6			
	1-6	What is the distinction between the "energy use and sustainability" resource issue and the "climate change" resource issue. If the proposed action is not expected to increase energy usage and will be carried out using sustainable practices then why is energy use and sustainability still being considered in the EA?	The climate change topic addresses a broader range of factors, such as vehicle emissions, than do the energy use and sustainability topics. Therefore, these two topics are considered.
	1-7	Is there a specific standard or baseline that is used to determine whether there will be impacts on demographics and environmental justice?	Comment noted. Final EA has been revised to reflect this comment. See Section 1.6.
	1-8	Geology, Topography, and Soils: While it may be prudent to eliminate this resource issue from further analysis, the description should mention that the proposal also includes the Annex site which is where some excavation will occur to construct the parking access.	Comment noted. Final EA has been revised to reflect this comment. See Section 1.6.
2.2			

Section	Page	Comment	Response
	2-3	The locations of the two museum spaces are described as being on the ground floor of the OPO however Figure 2-1 shows a museum space located in the tower. According to the latest plans presented at the Section 106 discussions, the museum spaces are located in the ground floor. Is this an inaccuracy in the EA?	The section 106 presentation from November 27, 2012 shows museum space on the 9 <sup>th</sup> floor. The Final EA includes updated graphics and text has been revised to reflect the most current plans for the redevelopment.
	2-6	The use of the term “intact” makes it seem like alterations will be made to the exterior but the existing fabric will remain intact. It might be better to describe the exterior work as “rehabilitated.”	Changed as suggested. See Section 2.2.
	2-7	The Annex: This section will be to be updated once the analysis of the 11 <sup>th</sup> Street pedestrian connection to C Street is completed, and the completion of the analysis of the east-west connection through the Annex to 10 <sup>th</sup> Street. In addition, as described in detail later in these comments, further analysis should be given to the location of the parking entrance as it relates to continued access to the garage during closures of Pennsylvania Avenue for events and inaugurations.	Revised the Considered but Dismissed discussion in Section 2.6 to reflect comments.
	2-9	It is very important that a determination be made early in the design development process as to whether any perimeter security will be necessary for the IRS Building as a result of the proposed driveway. If perimeter security will be necessary it should be factored into the design.	Comment noted. Final EA has been revised to reflect this comment. See Section 2.2
	2-9	Similar to comment above, this section will be to be updated once the analysis of the 11 <sup>th</sup> Street pedestrian connection to C Street is complete.	Please see Section 2.2.2 for a discussion of the 11 <sup>th</sup> Street Pedestrian Connection.
	2-9	Has there been any consideration given to the inclusion of a second guest reception desk on the 12 <sup>th</sup> Street side of the Cortile. While this may be a lower volume entrance than the 11 <sup>th</sup> Street side, considering that there is another elevator on	The Preferred Selected Developer has determined the programming for the interior of the space.

Section	Page	Comment	Response
	2-11	Figure 2-8: Have vehicular turning movements been studied and determined for the driveway? There was previous discussion regarding the potential for “right-in, right-out” turn restrictions given potential traffic impacts and bike lane conflicts.	<p>Right-in, right-out movements added to considered but dismissed discussion in Section 2.6.</p> <p>The graphic has been updated to reflect right turn movements.</p> <p>In the transportation study two options were studied for the driveway, a right-turn in and out only option and full movement option. These options were studied as a direct request from DDOT. Please see comments from DDOT regarding the Draft EA and transportation study. The preferred selected developer would coordinate the realignment of the intersection with DDOT during the public space permitting process.</p>
2.4			
	2-16	Change “summarized” to “summarizes”	Changed as suggested.
2.5			
	2-17	A proposed action shouldn’t be needed in order to comply with a piece of legislation. As stated in the second paragraph, the project is needed in order to achieve the purpose of the OPO Redevelopment Act.	GSA’s primary purpose and need for the proposed action is to comply with the legislation, compliance with the PL achieves the purposes in the Act.
	2-17	Because security screening takes place does not mean that	Comment noted. Final EA has been

Section	Page	Comment	Response
		public access is not currently allowed. This sentence should be modified to state that the redevelopment project would improve public access by removing the need for security screening prior to entering the building.	revised to reflect this comment. See Section 2.5.
	2-17	Typo “adding an additional attractions...”	Comment noted. Final EA has been revised to reflect this comment. Please see Section 2.5.
	2-17	A better term to use when referring to the Comprehensive Plan is “to be consistent” rather than “comply.” Another important plan that this project will be consistent with is the Monumental Core Framework Plan.	Comment noted. Final EA has been revised to reflect this comment. Please see Sections 2.5 and 3.2.5.
3.2			
	3-3	Typo: first column, last paragraph “offices buildings.”	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.
	3-4	Need to confirm that NPS still operates an ice skating rink at Pershing Park in the winter.	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.
3.2.2			
	3-4	The discontinuance of the existing federal office use should be further described to include the number of federal employees and amount of office space that will need to be reestablished in another location.	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.2.
	3-4	What would be the duration and magnitude of the impacts to the existing federal office space?	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.2.
	3-4	It is not clear why the indirect impacts to public land uses would be minor. At most, the impacts would be negligible. What long-term detectable impacts are anticipated? Perhaps, short-term minor impacts could be possible to the clock tower and access to the PA Ave National Historic Site.	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.2.

Section	Page	Comment	Response
	3-4	It is not clear why the influence of the OPO project on other hotel operations would be described in this EA. If such is the case, then an assessment on the impact of converting the existing OPO retail, which is geared toward to one clientele, to more high-end retail should also be discussed. Conversion of the food court, which is heavily used by visitors, to more expensive retail and dining can be expected to have some impact on the availability of visitor amenities in the area.	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.2.
3.2.3			
	3-6	This section should include the legislation that was passed that formally designated the OPO as the “Nancy Hanks Center” which also included a requirement to establish a commemorative element marking Nancy Hanks’ achievements. The analysis should describe how the proposed redevelopment will comply with the commemoration requirement and whether it is required that a formal display of the “Nancy Hanks Center” be included on the exterior of the building.	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.1, 3.2.3, and 3.2.3.
	3-6	What forms of alternative energy sources will be used in the planned hotel and conference center?	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.5.
	3-12	Zoning: In addition to the Zoning Act, NCPC’s in-lieu of zoning authority pursuant to the National Capital Planning Act should be cited.	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.4.
	3-12	Zoning: This section should be modified to better describe the recent action by the Zoning Commission to zone the site DD/C-4 and to make absolutely clear that despite the recent zoning designation and the planned operation of the site as a luxury hotel and conference center, pursuant to a long-term public-private lease between the Trump Organization and GSA, the redevelopment project remains subject to NCPC’s	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.4.  To avoid summarizing incorrectly, the NCPC action has been added to the Final EA in Section 4.6 as an appendix.

Section	Page	Comment	Response
		in-lieu of zoning authority. This section could even include a summary of the action taken by NCPC on January 10, 2012 regarding the proposed zoning of the site. The modified section should also reference the applicability of GSA's P100 facility standards to the redevelopment project.	
3.2.4			
	3-13	Replace "comply" with "be consistent with" or "not be inconsistent with"	Changed as suggested throughout the Final EA.
	3-13	The driveway should not be described as a "reopening of 11 <sup>th</sup> Street." 11 <sup>th</sup> Street was formally closed in the 1920s and this project does not propose a reopening. In addition, the driveway will not function anything like a public, or even a private, street. It will solely function as a driveway for hotel pick-up and drop-off.	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.5.
	3-13	It should be mentioned that the curb cut would require a transfer of jurisdiction from NPS to GSA which first requires NCPC approval.	Comment noted. GSA is coordinating with NPS regarding the appropriate means to address the jurisdictional issues. The Final EA is updated to include a discussion regarding any needed permitting or transfers of jurisdiction for the curb cut. The language in the Final EA is reflective of the coordination with NPS, including NPS reviewing and approving the language in the Final EA.
	3-13	Is any of the proposed seating along Penn Avenue located in public space and subject to a public space permit?	The seating would not be within the Pennsylvania Avenue public space; the Final EA has been revised to reflect this comment. Please see Section 3.3.2.
	3-13	The Framework Plan also promotes improving the	Analyzed in Section 2.6 considered but

Section	Page	Comment	Response
		pedestrian experience throughout the Federal Triangle. If it is determined that a pedestrian connection can be successfully accomplished between 11 <sup>th</sup> Street and C Street then this is something that will further advance the Framework Plan's vision. NCPC staff supports the establishment of this pedestrian connection and recommends that it continue to be explored, as well as an east-west internal connection through the Annex to 10 <sup>th</sup> Street for use during certain events taking place at the conference center.	dismissed.  An internal connection through the Annex to 10 <sup>th</sup> Street has been added to the description of the Action Alternative in the EA. This connection has been consulted on through the 106 process.
	3-14	In describing the impacts of the curb cut the relative impacts of the pick-up and drop-off alternatives along C Street, 12 <sup>th</sup> Street, and Penn Ave should be referenced as well. A successful justification of the proposed curb cut will rely heavily on a full analysis of the alternatives and choosing of the alternative with the least impacts from an overall planning perspective. It would be beneficial if the analysis of the alternative to pick-up and drop-off took into consideration an alternative that provided no onsite parking and an analysis of other projects that may or may not possess curb cuts on PA Ave (Reagan Building, Willard Hotel, JW Marriott, Canadian Embassy, and Newseum). This analysis would document the circumstances that may differentiate the OPO from these other projects.	Added discussion to Chapter 2, please see Section 2.6.  Please see response below for why detailed analysis was not conducted for no on-site parking.  The proposed driveway in the 11 <sup>th</sup> Street historic right-of-way is the only location adjacent to the Old Post office that will not impede normal pedestrian movement on the public sidewalks around the building. It does not cut into the sidewalk as a U-shaped drop-off would, and it is not a "mid-block" curb cut. Rather, it reestablishes the scale and rhythm—if not the full public use--of the L'Enfant Plan blocks on Pennsylvania Avenue by dividing an artificial two-block length of sidewalk and completing an existing 3-sided intersection.



Section	Page	Comment	Response
3.3			
	3-16	Isn't the 11 <sup>th</sup> Street entrance currently closed? If so, this should also be noted.	The Final EA has been revised to reflect this comment. Please see Section 3.3.1.
	3-16	Typo: Hyphen should replace point in reference to Public Law 92-578.	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.2.4.
	3-16	It should be noted that the OPO is not located within the PADC boundary.	The Final EA has been revised to reflect this comment. Please see Section 3. 2.4.
	3-17	The public space along 11 <sup>th</sup> Street should no longer exist. 11 <sup>th</sup> Street was formally closed in the 1920s. If the same rules applied back then as they do today, upon closure of 11 <sup>th</sup> Street the land would have been divided in half and deeded over to the adjacent property owners, which happens to be the United States Government. Therefore, improvements to the space that once was the public right-of-way of 11 <sup>th</sup> Street shouldn't be considered public space anymore.	Deleted discussion.
	3-17	What changes are proposed to the public space along 12 <sup>th</sup> Street?	The Final EA has been revised to reflect this comment. Please see Section 3.3.3.
	3-17	Is the seating along Pennsylvania Avenue actually within public space or is it within the property line of the OPO and just so happens to appear as if it is public space? Where is the Pennsylvania Avenue right-of-way in relation to the "additional sidewalk area" described in the EA?	The Final EA has been revised to reflect this comment. Please see Section 3.3.3.
	3-17	Is GSA intending on trying to formally close C Street? If so, this should be noted. The EA should be modified to state that formal closure is being pursued and if successful a public space permit will not be required.	Revised to GSA is in the process of completing the closure of C Street, which was initiated in 1986. The Final EA has been revised to reflect this

Section	Page	Comment	Response
			comment. Please see Section 3.3.3.
	3-18	What landscaping is being proposed along 12 <sup>th</sup> Street that would “reduce the amount of sidewalk space for pedestrian flow? The sidewalk along 12 <sup>th</sup> Street is already quite constrained, especially during peak tourist season as 12 <sup>th</sup> Street is a major pedestrian route from the Mall into downtown, and therefore, nothing should be done to further reduce pedestrian circulation space.	Graphics updated in Chapter 2 of Final EA. Final EA revised throughout document to reflect that no changes to public space would occur.
	3-19	The 11 <sup>th</sup> Street corridor is not being extended south of Pennsylvania Avenue. This portion of the sentence should be removed.	The Final EA has been revised to reflect this comment. Please see Section 3.3.3.
3.4.2			
	3-20	Typo: “The Annex offers an addition 50,277 sf of retail space...”	The Final EA has been revised to reflect this comment. Please see Section 3.4.2.
3.4.3			
	3-21	This section should include an estimate of how much is currently provided to the District of Columbia in Possessory Use Tax and what will be paid following redevelopment of the OPO. Currently, the District uses the existing commercial tax rate in order to calculate the Possessory Use Tax.	Comment noted.
3.5.4			
	3-32	Typo: Second column “to to”	The Final EA has been revised to reflect this comment. Please see Section 3.5.4.
	3-33	The indirect beneficial impact to the Arial Rios Building seems a bit contrived. In fact, removal of the glass structure may further expose views toward the loading area.	The Final EA has been revised to reflect this comment. Please see Section 3.5.4.
3.6.1			
	3-37	A photograph looking toward Pershing Park along	The Final EA has been revised to

Section	Page	Comment	Response
		Pennsylvania Avenue should also be included in the EA since it is referenced as an endpoint to this view corridor.	reflect this comment. Please see Section 3.6.1.
	3-38	A photograph of the view looking south along 12 <sup>th</sup> Street should be included in the EA	The Final EA has been revised to reflect this comment. Please see Section 3.6.1.
3.6.4			
	3-42	Typo: Second column "Signage used at the OPO should be and unobtrusive..."	The Final EA has been revised to reflect this comment. Please see Section 3.6.4.
3.7.2			
	3-43	Where is the "four foot wide continuous planting opening" proposed to be located along 12 <sup>th</sup> Street?	Chapter 2 of the EA is updated with current landscaping plans for the redevelopment Plantings along 12 <sup>th</sup> Street are no longer proposed, the analysis throughout the Final EA has been updated to remove reference to plantings on 12 <sup>th</sup> Street.
3.8.2			
	3-46	To NCPC's staff's knowledge, the EISA storm water requirements do not apply to this project. However, if they do apply, then quantitative information that demonstrates compliance with EISA Section 438 should be included in the EA. Please refer to the EPA's guidance on how to properly document EISA compliance.	The redevelopment will result in more than 5,000 sf of ground disturbance. The preferred selected developer will be responsible for developing a stormwater management plan for the project. Section 3.8: Stormwater Management has been updated with information regarding the approach to stormwater management at the site.
3.11 & 3.12		SEE COMMENTS ON TRANSPORTATION STUDY	
3.15.2			

Section	Page	Comment	Response
	3-80	The list of projects included in the cumulative impacts sections omits several large private projects that are currently underway that could substantially add to cumulative impacts, especially transportation impacts. Examples if such projects include the Center City and Convention Center hotel developments.	GSA coordinated the scope of the transportation study with District Department of Transportation, including any projects that needed to be included as background development. DDOT did not require GSA to include these development projects for the following reasons: Impacts from the proposed redevelopment of the OPO are minimal and for the study area intersections, the cumulative impacts from Center City and Convention Center would be negligible or not measurable.
	3-83	The list of planned projects should mention the ongoing work related to comprehensive perimeter security throughout the Federal Triangle	Comment noted. The Final EA has been revised to include the Herbert C. Hoover perimeter security project. See Section 3.15. GSA currently is developing design for the Herbert C. Hoover Building perimeter security. Other perimeter security projects in early planning stages include DOJ, EPA and IRS. As the DOJ, EPA and IRS perimeter security projects are not funded, it is uncertain if or when they would be implemented. A concept design has not yet been developed for these buildings and the extent of their impact is currently not known. GSA does intend that the permanent

Section	Page	Comment	Response
			measures have less of an impact than the current temporary measures.
3.15.3			
	3-84	The placement of substantial, unmitigated perimeter security between the sidewalk and vehicular right-of-way throughout the Federal Triangle could result in significant cumulative impacts to public space, visual resources, pedestrian circulation, and historic resources.	Characterizing any future perimeter security projects as unmitigated is not accurate. GSA will fully coordinate the concept design for future perimeter security projects with CFA, NCPC, DDOT, DCOP, SHPO and other stakeholders.
TRANSPORTATION STUDY			
2.1			
	2-1	Typo "East Street NW"	Comment noted. Final Transportation Study has been revised to reflect this comment. Please see Section 2.1.
	2-1	The Pennsylvania Avenue bike lane extends all the way to 15 <sup>th</sup> Street.	Comment noted. Final EA and Transportation Study have been revised to reflect this comment. Please see 3.11.6 of the Final EA and Section 2.2 of the Final Transportation Study.
	2-3	The statement that 11 <sup>th</sup> Street is proposed to be extended should be modified to more clearly convey the proposal to construct a driveway along the 11 <sup>th</sup> Street alignment.	Comment noted. Final Transportation Study has been revised to reflect this comment. Please see Section 2.1.
	2-3	The description of the existing conditions for 10 <sup>th</sup> Street should mention that this section of 10 <sup>th</sup> Street serves as a layby for several Metrobus routes.	Comment noted. Final EA and Transportation Study have been revised to reflect this comment. Please see Section 3.11.1 of the Final

Section	Page	Comment	Response
			Ea and Section 2.1 of the Final Transportation Study.
	2-3	It would be helpful if the study included a table showing the existing vehicle counts similar to the pedestrian counts in Table 2-1	Comment noted. Final EA has been revised to reflect this comment. Please see Section 3.11.1.
2.3			
	2-6	Typo: Description of 12 <sup>th</sup> Street mid-block pedestrian crossing	Comment noted. Final Transportation Study has been revised to reflect this comment. Please see Section 2.3.
	2-6	Are there any plans to include improvements to the existing mid-block crossings as part of the redevelopment project, especially considering the increase of pedestrian traffic that may occur as a result of the hotel, conference facility, and retail?	<p>The only mid-block crossing is the existing 12<sup>th</sup> street crossing. The existing narrow ramp at the 12<sup>th</sup> Street crosswalk would be improved to a wider ramp that is handicap accessible.</p> <p>As a result of the reconfiguration of the 11<sup>th</sup> Street and Pennsylvania Avenue intersection, it is anticipated that some improvements the pedestrian crosswalks would be necessary and implemented. Final EA and Transportation Study have been revised to reflect this comment. Please see Section 3.11.6 of the Final EA and Section 2.3 of the Transportation Study.</p>
2.4			
	2-7	The location of the Archives – Navy Memorial station should be mentioned.	Comment noted. Final EA and Transportation Study have been revised to reflect this comment.

Section	Page	Comment	Response
			Please see Section 3.11.8 of the Final EA and Section 2.4 of the Transportation Study.
	2-7	Typo: Last sentence in last paragraph.	Comment noted. Final Transportation Study has been revised to reflect this comment. Please see Section 2.4.
2.6			
	2-11	What is the unit of measure for the “Crash Rate” column? Is this crashes per unit of time? If so, what is the unit of time?	Comment noted. Final Transportation Study has been revised to reflect this comment. Please see Section 2.6.
2.7.1			
	2-12	The three peak periods are all more than two hours. What is the “2-hour peak period” reference referring to?	Comment noted. Final EA and Transportation Study have been revised to reflect this comment. Please see Section 3.11.1 of the Final EA and Section 2.7.1 of the Transportation Study.
2.7.2			
	2-12	Typo: Last sentence on page in second column	Comment noted. Final Transportation Study has been revised to reflect this comment. Please see Section 2.7.2.
3.0			
	3-1	Will any of the proposed 150 parking spaces be dedicated to employee parking?	A small number (less than 5) may be dedicated to executive level employees. The remaining parking will be valet parking.
3.1			
	3-3	Has a detailed study been conducted to determine the feasibility of relying upon valet service to existing commercial parking garages? If not, what is the reason for not conducting this analysis? Also, in general, what hotels	Comment noted. Discussion added to Chapter 2 of the Final EA. Please see Section 2.6.

Section	Page	Comment	Response
		were used to establish the proposed hotel's competitive set in order to determine the appropriate amount of parking, number of hotel rooms, and amount of conference space?	Programming needs of the hotel were determined by the preferred selected developer. The program reflects what is required for the redevelopment to be successful.
3.2			
	3-3	This section will need to be updated if it is determined prior to the final issuance of the EA that a pedestrian connection from the 11 <sup>th</sup> Street driveway to C Street is feasible.	Comment noted.
4.0			
	4-1	The Themes and Strategies section of the Monumental Core Framework Plan includes strategies for strengthening the public realm in the Monumental Core and specifically identifies certain pedestrian circulation improvements and enhanced intersections within the OPO study area. This should be addressed in the transportation study and transportation section of the EA.	Comment noted. Final EA and Transportation Study have been revised to reflect this comment. Please see Section 3.11.6 of the Final EA and Section 4.0 of the Transportation Study.
4.1			
	4-1	The term "truncated domes" should be clarified.	Comment noted. Final EA and Transportation Study have been revised to reflect this comment. Please see Section 3.11.5 of the Final EA and Section 4.1 of the Transportation Study.
	4-4	Are the recommendations made to DDOT taken from the DC Bike Master Plan or are these new recommendations that are being made to DDOT that stem from this transportation study?	Recommendations are taken from the DC Bike Master Plan.
5.1.1			



Section	Page	Comment	Response
	5-1	The reference to “opening the south leg of 11 <sup>th</sup> Street” should be reworded to state “the construction of a driveway.” 11 <sup>th</sup> Street was formally closed and it is not being proposed to be reopened as a public street. In addition, what is currently being proposed is not intended to be a street nor will it function like a street.	Comment noted. Final Transportation Study has been revised to reflect this comment. Please see Section 5.1.1
5.1.3			
	5-1	The decision to not include any background traffic growth is atypical and is unlike any other transportation study that NCPC staff has reviewed in the recent past. Normally a background growth of one or two percent is applied. Please provide additional information that can justify how this decision was made. Were similar assumptions made for the transportation studies conducted for the African American Museum of History and Culture, National Aquarium, Vietnam Veterans Memorial Visitor Center, and Center City projects?	GSA reviewed historic traffic count information for the study intersections no growth was detected between 2007- 2009. This was also reviewed with DDOT during the development of the transportation study, according to DDOT it is not reasonable to assume that traffic growth occurs in perpetuity. DDOT has observed that background traffic growth for the District has seen a “leveling off.” This is consistent with transportation studies that GSA recently completed for the Nebraska Avenue Complex Master Planning effort (unpublished, but completed in 2011), and the transportation study that was conducted for GSA’s disposal action of the West Heating Plant in Georgetown (completed January 2013).
5.2			
	5-1	Please explain what factors went into the decision to use ITE	The ITE manual categorizes land uses

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		data for purposes of developing trip generation rates as opposed to “other appropriate site trip generation rates.”	by type and provides a means to calculate vehicular trips entering and exiting sites, and is the industry standard for transportation professionals analyzing the site impact of proposed development projects. The main factor that went into the decision to use ITE data was that the hotel land use is well studied and documented in the ITE trip generation handbook.
	5-1	Please clarify why the ITE rates used for the project are being interpreted as person-trips and not vehicle-trips. As stated in the EA, the ITE data is considered to be the industry standard and was developed, and interpreted, to include vehicle trip rates. How is a decision to reinterpret the rates to mean something else justified? In addition, it is never stated what the ITE standards for hotels, conference centers, and retail are. It should be stated what these standards are so that the reader can follow how the total number of trips for the site was devised. For example, for the hotel the reader should be able to apply the ITE standard number of trips (in / out) per room to the proposed 267 rooms (factoring some percentage occupancy) in order to determine the possible number of in and out trips generated by the hotel. The same data should be made available for the other proposed uses.	Comment noted. The Final EA and Transportation Study have been revised to address the comment. Please see Section 3.11.2 of the Final EA and Section 5.2 of the Transportation Study  Appendix E shows a detailed trip generation spreadsheet, prepared in close coordination with DDOT, showing the requested information about ITE standards. For example the hotel land use generates per ITE 0.59 trips per room for the PM peak hour. 53% PM In and 47% PM out. Using the modal split rate, trips are calculated in the table.
	5-1	Please clarify the statement “Enough similarities exist between luxury and standard hotels when referring to trips in terms of people-per-room.”	Comment noted. Final Transportation Study has been revised to reflect this comment. Please see Section 5.2.

Section	Page	Comment	Response
	5-1	Please explain further what data was used to calculate the “automobile percentage” including the origin of the data.	Comment noted. Final EA and Transportation Study has been revised to reflect this comment. Please see Section 3.11.2 of the Final EA and Section 5.2 of the Transportation Study.
	5-1	What is the relevance of the NYC set of guidelines for trip generations?	Luxury hotel in urban setting with mass transit available.
	5-2	What efforts were taken to collect or acquire data pertaining to transit mode splits for hotels located closer to the OPO (Willard, W Hotel, JW Marriott, Hotel Monaco, Courtyard Marriott, Renaissance, etc.)? These hotels, the Washington Convention Center Authority, or Destination DC may collect this data.	Comment noted. WMATA data was used for regional hotels with nearby metro stations. Data from the Washington Convention Center EIS was also used in determining these calculations. GSA used the best information available in published studies. Final EA and Transportation Study revised to address comment. Please see Section 3.11.2 of the Final EA and Section 5.2.2 of the Transportation Study.
5.2.1			
	5-2	How were the existing trip generation data collected? It appears that ITE and the WMATA survey were relied upon but it isn't clear why. What wasn't there an independent survey conducts at the four building entrances, especially since GSA has jurisdiction over the property?	ITE rates were used to provide trip generation for the office space, the WMATA survey was used to fine tune that data. The WMATA survey included office buildings in close proximity to metro stations that did not have on-site parking. GSA, in coordination with DDOT, reviewed the WMATA survey for relevant site(s) that could provide modal split information.

Section	Page	Comment	Response
			While GSA may have jurisdiction over the property, GSA chose not to conduct such a survey due to privacy and funding concerns.
	5-2	With no onsite parking currently, what is the relevance of stating the current percentage of automobile trips?	As stated previously, the WMATA survey indicates that although no onsite parking is provided, office use still generates vehicle trips (parking is available in nearby parking garages).
	5-2	The analysis would be more informative if existing mode splits were broken out and tallied to 100%.	Comment noted.
5.2.2			
	5-2	The last paragraph in the second column should be written for clarity. While the quantitative data is helpful, noting that other areas of the transportation could use the same level of detail, the data are merely scattered throughout the paragraph without a clear narrative describing the data in layman terms. It will be difficult for the typical reader to make sense of this paragraph.	Comment noted. Final Transportation Study has been revised to reflect this comment. Please see Section 5.2.2.
5.2.3			
	5-3	It is not clear how the existing land use can generate the number of automobile trips that it does considering that there currently is no onsite parking.	As stated previously, the WMATA survey indicates that although no onsite parking is provided, office use still generates vehicle trips (parking is available in nearby parking garages).
	5-4	The distribution numbers in Figures 5-1, 5-2, 5-3, 5-4, 5-5, 5-6 should include ALL building generated trips as the site currently does not generate any automobile trips, and in particular to or from the 11 <sup>th</sup> Street driveway, and therefore all of these trips would be new trips to the surrounding	This statement is not correct. The site does currently generate automobile trips. Methodology for estimating trips generated by existing uses was coordinated with DDOT. Please see

Section	Page	Comment	Response
		network.	the response above.
5.4.2			
	5-10	Do the build roadway conditions for year 2016 include the same level of background traffic growth that was used for the EIS prepared for the National Museum of African American History and Culture? If not, please clarify why there are differences.	GSA reviewed historic traffic count information for the study intersections no growth was detected between 2007- 2009. Additionally, DDOT has indicated that it is not reasonable to assume that background traffic growth occurs in perpetuity
5.4.3			
	5-10	See comment for previous section.	
5.5.1			
	5-10	Impacts to pedestrian circulation should be reassessed after accounting for ALL build generated trips at the 11 <sup>th</sup> Street driveway.	This statement is not correct. The site does currently generate automobile trips. Methodology for estimating trips generated by existing uses was coordinated with DDOT, and has been outlined in previous responses.
5.5.3			
	5-10	References to “we” in the analysis should be removed from the EA. This also occurs in Section 5.2.2. Use of this sort of “voice” in the narrative is not found anywhere else in the EA.	Comment noted. Final Transportation Study has been revised throughout document to reflect this comment.
	5-10	Also, how was the existing transit trips generated by the site attained?	Comment noted. Final EA and Final Transportation Study have been revised to reflect this comment. Please see Section 3.11.8 of the EA and Section 5.5.3 of the Final Transportation Study.
	5-10	How were visitation numbers devised for the proposed land	The 250,000 annual visits are from

Section	Page	Comment	Response
		use? How does the expected 250,000 annual visitors breakdown between hotel guests, non-hotel guest conference attendees, museum / tower visitors, retail patrons?	NPS data and reflect visits to the clock tower. It is not expected that this number will grow substantially.
	5-11	Figures 5-7, 5-8, 5-9, 5-10, 5-11, 5-12, and Tables 5-2, 5-3, 5-4 should be recreated after accounting for ALL build generated trips.	See previous comment regarding current trip generation.  This statement is not correct, the site does currently generate automobile trips. Methodology for estimating trips generated by existing uses was coordinated with DDOT.
6.3			
	6-1	Under what regulation would the hotel operator be required to charge hotel guests a separate fee for parking?	While there is no regulation that would require such a charge, GSA through the development of the transportation study with DDOT has determined that this is an appropriate TDM measure for the redevelopment. This TDM measure has been reviewed and coordinated with the preferred selected developer, and the preferred selected developer has indicated that this a standard practice that they would implement for the project.
6.4			
	6-2	The first and third TDM measures seem unnecessary.	Please see comments from DDOT, at the time of the permitting process, DDOT will work with the preferred selected developer to craft the specifics of the TDM program. TDM measures provided in the

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			transportation study are suggested measures that could be implemented.

## 4.8 2013 INTERAGENCY AGREEMENT BETWEEN GSA AND NPS, IN ACCORDANCE WITH PL98-1.

INTERAGENCY AGREEMENT  
Between the  
U.S. GENERAL SERVICES ADMINISTRATION, PUBLIC BUILDINGS SERVICE  
And the  
DEPARTMENT OF THE INTERIOR, NATIONAL PARK SERVICE  
NATIONAL MALL AND MEMORIAL PARKS

### I. Purpose

The purpose of this Interagency Agreement (Agreement) between the General Services Administration (GSA) and the Department of the Interior, National Park Service, National Mall and Memorial Parks (NPS) (each a Party and collectively the Parties) is to carry out the obligations of each Party as defined in Section 4 of Public Law 98-1, 97 Stat. 3 (Feb. 15, 1983) (the Act), which directed GSA to "...execute an agreement with the Secretary of the Interior providing for operation of the observation tower ... by the National Park Service and further providing...for transfer to the National Park Service... such sums as may be necessary to operate the observation tower." The Old Post Office Tower (Tower) is listed on the National Register of Historic Places pursuant to 16 U.S.C. Section 470a, and is a primary element in the Pennsylvania Avenue National Historic Site. The Tower is part of the Old Post Office Building, which is located on the southeast corner of Pennsylvania Avenue and 12<sup>th</sup> Street, NW, in Washington, D.C., and is operated by GSA as a multi-use Federal building currently providing office and retail space.

### II. Roles

The GSA has the primary responsibility for the overall management and administrative jurisdiction of the Old Post Office Building. The NPS has the responsibility for providing visitor educational, historical, and informational services for the Tower.

### III. Authorities

The Terms of this Agreement are authorized under both the Act and Section 601 of the Economy Act of June 30, 1932, as amended, 31 U.S.C. 1535 and 1536, and the authorizing legislation of the Agencies involved.

### IV. Responsibilities

Pursuant to the Act, this document constitutes an Agreement between the NPS and the GSA, for the operation of visitor services operations in the Tower, as described below.

1. The Tower shall be operated in a manner consistent with the Act and the terms and conditions of this Agreement and the annual NPS Interpretive Operations Plan and Budget (Plan and Budget) mutually approved by the Parties for this purpose, and the requirements of the Economy Act will be met.
2. Any operational concerns regarding the Tower noted by either Party shall be brought to the attention of the other Party and shall be resolved in a timely and mutually acceptable manner.

National Park Service/ United States General Services Administration  
Old Post Tower Interagency Agreement Page 1 of 7

### A. NPS will provide:

1. Visitor services staff to accommodate visitors to the Tower. The GSA and the NPS shall mutually agree upon the hours and operational conditions of Tower. The NPS shall coordinate its activities to accommodate special events and programs sponsored by other agencies in the building. Funding for unbudgeted activities shall be the responsibility of the sponsoring agency.
2. Identification of any additional design needs for the visitor and NPS administrative spaces on the ground, 9th, 10th, and 12<sup>th</sup> floors of the Tower.
3. Proposed modifications, alterations, and construction plans for space alterations to the GSA for review and written approval to ensure the integrity of the historical character of the Tower and its fixtures.
4. An annual Plan and Budget to be submitted to GSA by July 15<sup>th</sup> for each fiscal year. The Plan and Budget will be reviewed and approved by the GSA by September 1<sup>st</sup> of the current year. Should either Party wish to modify the Parties' approved Plan and Budget, ninety (90) days written notice must be provided. Any modification to the Plan and Budget must be mutually agreed upon in writing by the Parties.
  - a. The Plan and Budget will provide:
    - i. Proposals and estimated costs for exhibits or other visual aids to interpret such themes as planning and development of the nation's capital, e.g., The L'Enfant Plan; Pennsylvania Avenue National Historic Site; historic places, national landmarks and cityscape; historic preservation; the Old Post Office Building and Tower; and the Ditchley Bells of Congress;
    - ii. Operational staffing needs;
    - iii. Estimated operations Plan and Budget; and
    - iv. The most efficient and effective use of available volunteer services and/or partnerships with local colleges.
  - b. The Plan and Budget shall be incorporated into this Agreement by reference and appended to this document as Attachment A to this Agreement. Attachment A shall be further identified by the applicable budget year.
  - c. Annual Plan and Budget submissions by NPS shall include estimates of Cost of Living Adjustments.
5. Public information services for the NPS activities in the Tower.
6. Coordination with the Washington Ringing Society for the ringing of the Ditchley Bells of Congress on holidays and on special occasions, as well as weekly practice sessions.

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7. Reasonable notice of all activities of the NPS which may affect GSA.
  8. For visitor and staff safety, consistent with NPS management responsibility and oversight, in areas assigned to the NPS at the Tower.
  9. Oversight of GSA contractors providing services relating to the Tower, consistent with NPS management responsibility.
  10. Compliance with GSA energy conservation plans and directives as attached and made a part of this Agreement, at no additional operational cost to NPS.
  11. Notice when NPS elects to furnish services at its sole cost or expense outside the scope of this Agreement.
  12. Contracted daily custodial maintenance for NPS assigned space on the ground, 9th, 10th and 12th floors of the Tower. This contracted daily custodial maintenance will be funded by GSA and shown as a line item in the annual Plan and Budget.
- B. The GSA will provide:**
1. Finished spaces in the ground floor waiting area, the 9<sup>th</sup>, 10<sup>th</sup>, and 12<sup>th</sup> floors of the Tower including adequate public access (including accessible access), to elevator facilities to all levels, as well as equipment necessary for the presentation of approved NPS activities related to the Old Post Office Building and Tower and Pennsylvania Avenue National Historic Site.
  2. Design recommendations and approvals for any modifications to the visitor spaces in the waiting area on the ground floor, or 9th, 10th, and 12<sup>th</sup> floors of the Tower. Such recommendations will be submitted to the NPS for review and comment before production or space alteration begins.
  3. The NPS operation and staffing funds as agreed to in the Plan and Budget. This amount will be agreed to by the Superintendent of National Mall and Memorial Parks each year preceding the beginning of the affected fiscal year and will be documented by the Principal GSA official managing the Tower operations.
  4. Maintenance services, other than routine daily custodial care, including elevator maintenance, repair and rehabilitation of space and audiovisual equipment in all areas assigned to the NPS, and all outside signs at no expense to the NPS. These services and repairs should be completed in a timely manner as to not affect the operation of the Tower. The GSA will reimburse the NPS for the cost of daily custodial maintenance. Any mutually agreed upon exceptions must be funded through the annual Plan and Budget.
  5. All utility services (electricity, heat, air conditioning, water, local phone services and a reasonable cost of long distance services), reasonably necessary for NPS operations in accordance with agreed upon services.

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6. Public restrooms on the ground floor accessible to all visitors, including the handicapped, and provision for the visiting public and NPS staff with emergency public restroom use on the 8<sup>th</sup> floor.
7. Reasonable advance notice of all GSA activities which may affect NPS operations and visitor services.
8. The identification of cost effective measures, mutually agreed upon by the Parties, for providing Tower services to ensure continued public services and access.
9. Federal protective and security services in all areas assigned to the NPS through the Department of Homeland Security's Federal Protective Service.
10. Assistance to NPS, as needed, in collaborating with lead Federal tenant on the building wide Occupant Emergency Plan.

**V. Term of Agreement**

This Agreement will commence on the date of the last signature affixed by the authorized representative of the Parties and will remain in effect until October 1, 2013 at which time the Agreement may be renewed upon the written agreement of the Parties, such writing to contain the new term and be attached to this Agreement. Consistent with the provisions of the Act, or any other superseding law or regulation, either Party may terminate this Agreement upon a ninety (90) day notification to the other Party.

**VI. Assignment**

No transfer or assignment of this Agreement, or of any part thereof or interest therein, directly or indirectly, voluntarily or involuntarily, shall be made unless such transfer or assignment is first approved in writing by the Parties.

**VII. Liability**

Each Party agrees to assume responsibility for any and all claims resulting from the acts or omissions of its employees or representatives, to the greatest extent permitted by law. In the event a claim is brought under the Federal Tort Claims Act, 28 U.S.C.A. Section 2671 et seq., (FTCA), it shall be the responsibility of the Party receiving the claim to coordinate with the other Party regarding responsibility to investigate any such claim, to issue an administrative determination as required by the FTCA, and to assist in the defense of any litigation arising from any such claim, and the other Party to cooperate in this effort.

**VIII. General**

1. GSA is directed to proceed with the redevelopment of the Old Post Office Building (Old Post Office Redevelopment Act of 2008) under section 111 of the National Historic

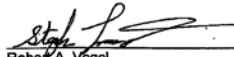
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Preservation Act (16 U.S.C. Section 470h-3). Any redevelopment will ensure continued public accessibility to the Tower. GSA will review and approve all general design and development plans and will coordinate, as appropriate, with NPS.

2. Nothing herein contained shall be construed as binding the United States to expend in any one fiscal year any sum in excess of appropriations made by Congress for the purpose of this Agreement for that fiscal year, or to involve the United States in any contract or other obligation for the further expenditure of money in excess of such appropriations.
3. No Member of Congress shall be admitted to any share or part of any contract or Agreement made, entered into, or accepted by or on behalf of the United States, or to any benefit to arise thereupon.
4. The GSA and the NPS agree that this Agreement shall be governed by, and interpreted in accordance with, Federal law.
5. The GSA and the NPS agree that if any paragraph or provision of this Agreement is held to be invalid or illegal, such paragraph or provision shall not affect the validity or enforceability of the remaining paragraphs or provisions.
6. The GSA and the NPS agree that compliance with the terms of this Agreement shall not excuse any failure to comply with applicable laws and regulations, whether or not these laws and regulations are expressly listed or addressed herein.
7. The GSA and the NPS agree that the term "days", as used in this Agreement, means Federal business days.

#### Approvals

Approval and Accepted for NPS:

  
for Robert A. Vogel  
Superintendent  
National Mall and Memorial Parks

Date 10/5/12

Approval and Accepted for GSA:

  
Clay Jones  
GSA Contracting Officer

Date 2/27/13

**4.9 SECTION 106 PROGRAMMATIC AGREEMENT  
AMONG THE UNITED STATES GENERAL  
SERVICES ADMINISTRATION, THE DISTRICT OF  
COLUMBIA HISTORIC PRESERVATION OFFICE,  
THE ADVISORY COUNCIL ON HISTORIC  
PRESERVATION, THE NATIONAL CAPITAL  
PLANNING COMMISSION, THE DISTRICT OF  
COLUMBIA DEPARTMENT OF  
TRANSPORTATION, AND TRUMP OLD POST  
OFFICE LLC REGARDING THE LEASING ,  
REHABILITATION, AND ONGOING  
MAINTENANCE OF THE OLD POST OFFICE  
BUILDING AND ANNEX, AND ASSOCIATED  
TRANSPORTATION IMPROVEMENTS,  
WASHINGTON, D.C.**

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